

**UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re:

CELSIUS NETWORK LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 22-10964 (MG)

(Jointly Administered)

**COVER SHEETS FOR THIRD INTERIM FEE APPLICATION OF
ERNST & YOUNG LLP FOR COMPENSATION FOR SERVICES RENDERED AND
REIMBURSEMENT OF EXPENSES AS TAX COMPLIANCE, TAX ADVISORY AND
FINANCIAL ACCOUNTING ADVISORY SERVICES PROVIDER FOR THE TIME
PERIOD MARCH 1, 2023 THROUGH JUNE 30, 2023**

| | |
|---|--|
| Name of Applicant: | Ernst & Young LLP (“ <u>EY LLP</u> ”) |
| Authorized to Provide Professional Services To: | The Debtors |
| Date of Retention: | December 20, 2022 (<i>effective as of</i> July 13, 2022) |
| Time Period Covered by this Application: | March 1, 2023 through June 30, 2023 |
| Total Fees Requested in This Application: | \$254,941.00 |
| Total Expenses Requested in This Application: | \$-0- |
| Total Fees and Expenses Requested in This Application: | \$254,941.00 |

This is a monthly X interim final application.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Celsius Network LLC (2148); Celsius KeyFi LLC (4414); Celsius Lending LLC (8417); Celsius Mining LLC (1387); Celsius Network Inc. (1219); Celsius Network Limited (8554); Celsius Networks Lending LLC (3390); Celsius US Holding LLC (7956); GK8 Ltd. (1209); GK8 UK Limited (0893); and GK8 USA LLC (9450). The location of Debtor Celsius Network LLC's principal place of business and the Debtors' service address in these chapter 11 cases is 50 Harrison Street, Suite 209F, Hoboken, New Jersey 07030.

Summary of Monthly Fee Statements for Third Interim Fee Period

| Fee Statement | Date Filed | Docket No. | Period Covered | Fees Requested | Expenses Requested | Fees Paid | Expenses Paid |
|---------------------------------------|-------------------|-------------------|-----------------------|---------------------------------------|---------------------------|------------------|----------------------|
| Combined Fourth Monthly Fee Statement | 6/30/23 | 2954 | 3/1/23 – 4/30/23 | \$109,624.00 (80% of \$137,030.00) | \$0.00 | \$0.00 | \$0.00 |
| Combined Fifth Monthly Fee Statement | | | 5/1/23 – 6/30/23 | \$94,328.80 (80% of \$117,911.00) | \$0.00 | \$0.00 | \$0.00 |

SUMMARY BY PROFESSIONAL²

| Last Name | First Name | Title | Hours | Hourly Rate | Total Individual Fees |
|-------------|---------------|--------------------|-------|-------------|-----------------------|
| Barda | Eli | Partner/Principal | 0.5 | \$850.00 | \$425.00 |
| Beattie | Steve | Partner/Principal | 1.0 | \$850.00 | \$850.00 |
| Bowden | Jamie | Senior Manager | 2.8 | \$950.00 | \$2,660.00 |
| Buonaguro | Paul | Manager | 6.4 | \$850.00 | \$5,440.00 |
| Carr | Russell | Partner/Principal | 15.4 | \$1,250.00 | \$19,250.00 |
| Chenchinski | Amir (2) | Partner/Principal | 1.7 | \$850.00 | \$1,445.00 |
| Coleman | Jade | Staff | 0.2 | \$400.00 | \$80.00 |
| Creel | Travis | Senior Manager | 1.2 | \$950.00 | \$1,140.00 |
| Flagg | Nancy | Executive Director | 40.1 | \$1,150.00 | \$46,115.00 |
| Gatt | Katherine | Senior Manager | 34.8 | \$950.00 | \$33,060.00 |
| Gillenwater | Emily | Senior | 0.2 | \$600.00 | \$120.00 |
| Harvey | Elizabeth | Partner/Principal | 24.5 | \$1,250.00 | \$30,625.00 |
| Harvey | Elizabeth (2) | Partner/Principal | 0.5 | \$850.00 | \$425.00 |
| Helwing | Dan | Partner/Principal | 3.4 | \$850.00 | \$2,890.00 |
| Hill | Jeanne | Senior Manager | 2.0 | \$950.00 | \$1,900.00 |
| Hill | Jeffrey | Partner/Principal | 0.5 | \$1,250.00 | \$625.00 |
| Hill | Jeffrey (2) | Partner/Principal | 0.5 | \$850.00 | \$425.00 |
| Jacobs | Steven | Partner/Principal | 0.5 | \$850.00 | \$425.00 |
| Jin | Crystal | Manager | 0.5 | \$595.00 | \$297.50 |
| Johnson | Derrick | Staff | 13.7 | \$400.00 | \$5,480.00 |
| Kapp | Amanda | Staff | 0.2 | \$400.00 | \$80.00 |
| LaGarde | Stephen | Partner/Principal | 0.5 | \$1,250.00 | \$625.00 |
| Li | Eric | Staff | 6.7 | \$400.00 | \$2,680.00 |
| Lipschutz | Jordan | Manager | 0.8 | \$595.00 | \$476.00 |
| Lombardi | Dino | Partner/Principal | 0.8 | \$1,250.00 | \$1,000.00 |
| Lowery | Kristie | Partner/Principal | 0.5 | \$1,250.00 | \$625.00 |
| Lubic | Jacob | Staff | 5.2 | \$400.00 | \$2,080.00 |
| Mitchell | Traci | Executive Director | 0.6 | \$1,150.00 | \$690.00 |
| Riley | Sean | Senior Manager | 0.8 | \$695.00 | \$556.00 |
| Ryan | Joe | Senior Manager | 2.0 | \$950.00 | \$1,900.00 |
| Sapir | Eric | Executive Director | 21.6 | \$1,150.00 | \$24,840.00 |
| Shwartz | Yoav (2) | Partner/Principal | 0.5 | \$850.00 | \$425.00 |
| Shwartz | Yoav | Partner/Principal | 25.6 | \$1,250.00 | \$32,000.00 |
| Sun | Kaiyang | Senior Manager | 0.8 | \$695.00 | \$556.00 |

² Rates have been applied consistent with the Statement of Work for which this individual provided services.

| Last Name | First Name | Title | Hours | Hourly Rate | Total Individual Fees |
|--------------|------------|--------------------|--------------|-------------|-----------------------|
| Tuchinsky | Maria | Senior Manager | 18.5 | \$950.00 | \$17,575.00 |
| Wasser | Michael | Executive Director | 1.0 | \$1,150.00 | \$1,150.00 |
| Wasserman | Ofer (2) | Senior Manager | 0.9 | \$695.00 | \$625.50 |
| Wehr | Robert | Senior Manager | 6.8 | \$950.00 | \$6,460.00 |
| Weiler | Sam | Partner/Principal | 0.5 | \$1,250.00 | \$625.00 |
| Wrenn | Kaitlin | Manager | 0.5 | \$850.00 | \$425.00 |
| Zaman | Sabina | Partner/Principal | 4.7 | \$850.00 | \$3,995.00 |
| Chenchinski | Amir | Partner/Principal | 7.7 | | Fixed Fee |
| Gandz | Benjamin | Senior Manager | 8.9 | | Fixed Fee |
| Geron | Eyal | Manager | 8.9 | | Fixed Fee |
| Gonen | Eyal | Partner/Principal | 2.0 | | Fixed Fee |
| Nazarenko | Maria | Staff | 2.5 | | Fixed Fee |
| Wasserman | Ofer | Senior Manager | 30.7 | | Fixed Fee |
| Sussman | Adam | Senior | 8.9 | | Fixed Fee |
| Total | | | 319.5 | | \$253,066.00 |

Total Fixed Fees Sought During the Fee Period for Transfer Pricing and Tax Compliance Services: \$0.00

Fee Application Preparation

| Last Name | First Name | Title | Hours | Hourly Rate | Total Fees |
|-----------------------|------------|-------|--------------|-------------|---------------------|
| Duncker | Debra | Staff | 7.5 | \$250.00 | \$1,875.00 |
| Total | | | 7.5 | | \$1,875.00 |
| Combined Total | | | 327.0 | | \$254,941.00 |

SUMMARY BY CATEGORY

| Time Category | Category Descriptions | Total Hours | Total Fees |
|-----------------------------|--|--------------|---------------------|
| Federal Tax Service | Assistance with analyzing the federal income tax considerations of historical transactions and potential restructuring alternatives. | 109.4 | \$128,440.00 |
| SALT Tax Service | Assistance with reviewing and remediating Client's sales/use and property tax filings. | 123.4 | \$110,810.00 |
| Tax Provision | Assistance with preparation of tax provision for the predecessor financial statements. | 2.6 | \$2,070.50 |
| External Audit Support | Assistance with drafting whitepapers and compiling related supporting documentation for the predecessor financial statements. | 6.2 | \$4,818.00 |
| Financial Statement Support | Assistance with compilation of predecessor financial statements including US GAAP and SEC checklists and disclosures. | 1.0 | \$850.00 |
| SEC Pre-Clearance | Assistance with review of SEC pre-clearance letter related to the predecessor financial statements. | 7.3 | \$6,077.50 |
| Transfer Pricing | Assistance with review and analysis of 2022 transfer pricing model. | 28.7 | Fixed Fee |
| Tax Compliance | Prepare tax returns | 40.9 | Fixed Fee |
| Total | | 319.5 | \$253,066.00 |

Total Fixed Fees Sought During the Fee Period for Transfer Pricing and Tax Compliance Services: \$0.00

Fee Application Preparation

| Time Category | Category Description | Total Hours | Total Fees |
|--------------------------------|---|--------------|---------------------|
| Preparation of Fee Application | This category relates to the preparation of fee application in format required by the Bankruptcy Court. | 7.5 | \$1,875.00 |
| Total | | 7.5 | \$1,875.00 |
| Combined Total | | 327.0 | \$254,941.00 |

**UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re:

CELSIUS NETWORK LLC, *et al.*,³

Debtors.

Chapter 11

Case No. 22-10964 (MG)

(Jointly Administered)

**THIRD INTERIM FEE APPLICATION OF ERNST & YOUNG LLP FOR
COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF
EXPENSES AS TAX COMPLIANCE, TAX ADVISORY AND FINANCIAL
ACCOUNTING ADVISORY SERVICES PROVIDER FOR THE TIME PERIOD
MARCH 1, 2023 THROUGH JUNE 30, 2023**

Pursuant to Sections 330 and 331 of Title 11 of the United States Code (the “Bankruptcy Code”) and Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and the *First Amended Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals and (II) Granting Related Relief* [Docket No. 1745] (the “Amended Interim Compensation Order”) approving procedures for professional compensation requests in these cases, Ernst & Young LLP (“EY LLP”) hereby files this Interim Application for compensation as a retained professional to the above-captioned Debtors (this “Application”).⁴ By this Application, EY LLP respectfully requests allowance and payment of \$254,941.00 as compensation and reimbursement of \$0.00 in expenses, with respect to services it provided to the Debtors during the period from March 1, 2023 through June 30, 2023 (the “Fee”).

³ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Celsius Network LLC (2148); Celsius KeyFi LLC (4414); Celsius Lending LLC (8417); Celsius Mining LLC (1387); Celsius Network Inc. (1219); Celsius Network Limited (8554); Celsius Networks Lending LLC (3390); Celsius US Holding LLC (7956); GK8 Ltd. (1209); GK8 UK Limited (0893); and GK8 USA LLC (9450). The location of Debtor Celsius Network LLC's principal place of business and the Debtors' service address in these chapter 11 cases is 50 Harrison Street, Suite 209F, Hoboken, New Jersey 0703.

Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Debtors' Application for Entry of an Order (I) Authorizing the Retention and Employment of Ernst & Young LLP as Tax Compliance and Tax Advisory Services Provider, Effective as of July 31, 2022 and (II) Granting Related Relief [Docket No. 1404] (the "Application for Retention").

Period”) In support of this Application, EY LLP submits the verification of Elizabeth Harvey, a partner with the firm of EY LLP (the “Harvey Verification”).

Background

1. On July 13, 2022 (the “Petition Date”), each of the Debtors filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101, *et seq.* (the “Bankruptcy Code”).

2. The Debtors’ retention of EY LLP was approved by the *Order (I) Authorizing the Retention and Employment of Ernst & Young LLP as Tax Compliance and Tax Advisory Services Provider, Effective as of July 13, 2022, and (II) Granting Related Relief* [Docket No. 1766].

3. On March 17, 2023, the Debtors filed the *Notice of Additional Statement of Work Related to the Retention and Employment of Ernst & Young LLP as Tax Compliance and Tax Advisory Services Provider* [Docket No. 2266].

4. On May 30, 2023, the Debtors filed the *Notice of Second Additional Statement of Work Related to the Retention and Employment of Ernst & Young LLP as Tax Compliance and Tax Advisory Services Provider* [Docket No. 2730].

5. On June 14, 2023, the Debtors filed the *Notice of Third Additional Statement of Work Related to the Retention and Employment of Ernst & Young LLP as Tax Compliance and Tax Advisory Services Provider* [Docket No. 2803].

6. EY LLP is authorized to be compensated under the terms set forth in the engagement letters between the Debtors and EY LLP, and to be reimbursed for actual and necessary out-of-pocket expenses.

Compensation Paid and Its Source

7. All services for which EY LLP requests compensation were performed for or on behalf of the Debtors. EY LLP has received no payment and no promises for payment from any source other than the Debtors for services rendered or to be rendered in any capacity in connection with the matters covered by this Application.

Supporting Detail

8. The services provided by EY LLP during the Compensation Period were actual and necessary for the administration of the Chapter 11 Cases, performed at the request of the Debtors and commensurate with the complexity and significance of this matter. The variety and complexity of the issues in the Chapter 11 Cases and the need to act or respond to such issues on an expedited basis during the Compensation Period required the expenditure of significant time by EY LLP professionals.

9. The supporting detail for this Application is attached hereto as **Exhibit A**. **Exhibit A** contains the daily time information for each EY LLP professional performing services during the period from March 1, 2023 through June 30, 2023.

Applicable Law

10. Section 330(a)(1) of the Bankruptcy Code provides, in relevant part, as follows:

(a) (1) After notice to the parties in interest and the United States Trustee and a hearing, and subject to sections 326, 328, and 329, the court may award to a ... professional person employed under section 327 or 1103 –

(A) reasonable compensation for actual, necessary services rendered by the trustee, examiner, ombudsman, professional person, or attorney and by any paraprofessional person employed by any such person; and

(B) reimbursement for actual, necessary expenses.

11. Section 330 of the Bankruptcy Code prescribes the general standards for determining the reasonableness of the amount of compensation sought by a professional. *See* 3

Collier on Bankruptcy ¶ 331.03 at 331-12. Congress enacted section 330 of the Bankruptcy Code to liberalize the practice of granting the allowance of compensation to professionals in bankruptcy cases in order to ensure that professionals be reasonably compensated and that future professionals not be deterred from taking bankruptcy cases due to a failure to pay adequate compensation. *See In re Ames Dep't Stores, Inc.*, 76 F.3d 66, 72 (2d Cir. 1996) (quoting *In re UNR Indus., Inc.*, 986 F.2d 207, 208-09 (7th Cir. 1993)).

12. Section 330(a) of the Bankruptcy Code provides for the compensation of reasonable and necessary services rendered by professionals based on the time, the nature, the extent and the value of such services, and the cost of comparable services other than in a case under the Bankruptcy Code. *See* 11 U.S.C. § 330. The test for determining necessity is objective; focusing on what services a reasonable professional would have performed under the same circumstances. *See, e.g., In re Angelika Films 57th, Inc.*, 227 B.R. 29, 42 (Bankr. S.D.N.Y. 1998). This test does not rely on hindsight to determine the ultimate success or failure of the professional's actions. *See id.; In re Keene Corp.*, 205 B.R. 690, 696 (Bankr. S.D.N.Y. 1997). Ultimately, if the services of a professional are reasonably likely to benefit the debtor's estate, they should be compensable. *See Angelika Films*, 227 B.R. at 42.

13. EY LLP respectfully submits that the compensation sought in this Application is necessary and reasonable. The services that EY LLP rendered to the Debtors during the Fee Period required a high degree of professional competence. EY LLP performed efficiently, effectively and economically, and the results obtained have benefited the Debtors, their estates and creditors.

WHEREFORE, EY LLP hereby respectfully requests allowance and payment of \$254,941.00 as compensation and reimbursement of \$0.00 in expenses, with respect to services it provided to the Debtors during the Fee Period. EY LLP also respectfully requests that it be granted such other and further relief as the Court may deem just and proper.

Dated: August 12, 2023

/s/ Elizabeth Harvey
Elizabeth Harvey
Partner, Ernst & Young LLP

VERIFICATION

I hereby certify that:

1. I am a partner with the firm of Ernst & Young LLP (“EY LLP”). This certification is made pursuant to the *Amended Guidelines for Fees and Disbursements for Professionals in Southern District of New York* (the “Amended Guidelines”), in support of the foregoing fee application of EY LLP (the “Application”).

2. I hereby certify as follows: (a) I have read the Application; (b) to the best of my knowledge, information and belief formed after reasonable inquiry, the fees and disbursements sought in the Application fall within the Amended Guidelines, except as specifically noted herein or in the Application; (c) except to the extent that fees or disbursements are prohibited by the Amended Guidelines, the fees and disbursements sought are billed at rates and in accordance with practices customarily employed by EY LLP and generally accepted by EY LLP’s clients; and (d) in providing a service for which EY LLP seeks reimbursement of expenses, EY LLP does not make a profit on the service, whether the service is performed by EY LLP in-house or through a third party.

Dated: August 12, 2023

/s/ Elizabeth Harvey
Elizabeth Harvey
Partner, Ernst & Young LLP

EXHIBIT A
TIME DETAIL OF HOURS INCURRED BY PROFESSIONAL

Federal Tax Consulting

| Name | Title | Transaction Date | Project Category | Description | Hours | Hourly Rate | Fee |
|------------------|--------------------|------------------|------------------|--|-------|-------------|------------|
| Elizabeth Harvey | Partner/Principal | 07 Mar 2023 | Tax Consulting | Reviewing and sending 2022 tax compliance SOW | 1.1 | \$1,250.00 | \$1,375.00 |
| Elizabeth Harvey | Partner/Principal | 14 Mar 2023 | Tax Consulting | Weekly tax call to discuss creditor claims against specific legal entities and potential bankruptcy substantive consolidation. Celsius: L. Koren and J. Morgan. Kirkland: A. Sexton, S. Cantor, and M. Kandallu. EY: E. Sapir, E. Harvey, and Y. Shwartz. Andersen:D. Seymour, and H. Griffiths. | 0.6 | \$1,250.00 | \$750.00 |
| Eric Sapir | Executive Director | 14 Mar 2023 | Tax Consulting | Weekly tax call to discuss creditor claims against specific legal entities and potential bankruptcy substantive consolidation. Celsius: L. Koren and J. Morgan. Kirkland: A. Sexton, S. Cantor, and M. Kandallu. EY: E. Sapir, E. Harvey, and Y. Shwartz. Andersen:D. Seymour, and H. Griffiths. | 0.6 | \$1,150.00 | \$690.00 |
| Yoav Shwartz | Partner/Principal | 14 Mar 2023 | Tax Consulting | Weekly tax call to discuss creditor claims against specific legal entities and potential bankruptcy substantive consolidation. Celsius: L. Koren and J. Morgan. Kirkland: A. Sexton, S. Cantor, and M. Kandallu. EY: E. Sapir, E. Harvey, and Y. Shwartz. Andersen:D. Seymour, and H. Griffiths. | 0.6 | \$1,250.00 | \$750.00 |
| Eric Sapir | Executive Director | 15 Mar 2023 | Tax Consulting | Tracking asset tax basis movements between the US and UK in 2021. | 1.3 | \$1,150.00 | \$1,495.00 |
| Elizabeth Harvey | Partner/Principal | 16 Mar 2023 | Tax Consulting | Reviewing balance sheet spreadsheet comparison for 2021 and 2022 to track 2022 income statement activity. | 2.9 | \$1,250.00 | \$3,625.00 |
| Eric Sapir | Executive Director | 16 Mar 2023 | Tax Consulting | Reviewing 2022 defi asset changes to identify impact to income statement. | 1.7 | \$1,150.00 | \$1,955.00 |

| Name | Title | Transaction Date | Project Category | Description | Hours | Hourly Rate | Fee |
|------------------|---------------------|------------------|------------------|---|-------|-------------|------------|
| Elizabeth Harvey | Partner/Principal | 20 Mar 2023 | Tax Consulting | Review balance sheet comparison files to prepare questions for client discussion on 2022 income statement activity and transfers. | 3.2 | \$1,250.00 | \$4,000.00 |
| Eric Sapir | Executive Director | 20 Mar 2023 | Tax Consulting | Update balance sheet comparison to attempt to locate transfers between the US and UK. | 2.8 | \$1,150.00 | \$3,220.00 |
| Elizabeth Harvey | Partner/Principal | 21 Mar 2023 | Tax Consulting | Weekly tax call to discuss tax treatment of retail loan customers. EY: E. Sapir, E. Harvey, and Y. Schwartz. Kirkland: A. Sexton, S. Cantor, and M. Kandallu. Celsius: L. Koren. Andersen: S. Shears, H. Griffiths, Z. Wyatt, and D. Seymour. | 0.6 | \$1,250.00 | \$750.00 |
| Eric Sapir | Executive Director | 21 Mar 2023 | Tax Consulting | Weekly tax call to discuss tax treatment of retail loan customers. EY: E. Sapir, E. Harvey, and Y. Schwartz. Kirkland: A. Sexton, S. Cantor, and M. Kandallu. Celsius: L. Koren. Andersen: S. Shears, H. Griffiths, Z. Wyatt, and D. Seymour. | 0.6 | \$1,150.00 | \$690.00 |
| Yoav Shwartz | Partner / Principal | 21 Mar 2023 | Tax Consulting | Weekly tax call to discuss tax treatment of retail loan customers. EY: E. Sapir, E. Harvey, and Y. Schwartz. Kirkland: A. Sexton, S. Cantor, and M. Kandallu. Celsius: L. Koren. Andersen: S. Shears, H. Griffiths, Z. Wyatt, and D. Seymour. | 0.6 | \$1,250.00 | \$750.00 |
| Elizabeth Harvey | Partner/Principal | 22 Mar 2023 | Tax Consulting | Review client information on mining assets to calculate tax basis | 2.9 | \$1,250.00 | \$3,625.00 |
| Elizabeth Harvey | Partner/Principal | 22 Mar 2023 | Tax Consulting | Internal EY call to discuss bankruptcy status update, including fixed asset information required for federal tax calculations. Attendees: N.Flagg, E.Harvey, E.Sapir | 0.4 | \$1,250.00 | \$500.00 |
| Eric Sapir | Executive Director | 22 Mar 2023 | Tax Consulting | Internal EY call to discuss bankruptcy status update, including fixed asset information required for federal tax calculations. Attendees: N.Flagg, E.Harvey, E.Sapir | 0.4 | \$1,150.00 | \$460.00 |

| Name | Title | Transaction Date | Project Category | Description | Hours | Hourly Rate | Fee |
|------------------|--------------------|------------------|------------------|--|-------|-------------|------------|
| Eric Sapir | Executive Director | 22 Mar 2023 | Tax Consulting | Estimate tax basis in Celsius Mining assets. | 2.1 | \$1,150.00 | \$2,415.00 |
| Elizabeth Harvey | Partner/Principal | 23 Mar 2023 | Tax Consulting | Call to discuss tax basis in mining assets and expected capital expenditures. EY: E. Sapir and E. Harvey. Celsius: J. Morgan. | 0.8 | \$1,250.00 | \$1,000.00 |
| Eric Sapir | Executive Director | 23 Mar 2023 | Tax Consulting | Call to discuss tax basis in mining assets and expected capital expenditures. EY: E. Sapir and E. Harvey. Celsius: J. Morgan. | 0.8 | \$1,150.00 | \$920.00 |
| Elizabeth Harvey | Partner/Principal | 24 Mar 2023 | Tax Consulting | Updating mining tax basis schedules from client information. | 1.1 | \$1,250.00 | \$1,375.00 |
| Dino Lombardi | Partner/Principal | 25 Mar 2023 | Tax Consulting | Responded to question with regards to proper recovery period for crypto mining rigs. | 0.8 | \$1,250.00 | \$1,000.00 |
| Elizabeth Harvey | Partner/Principal | 27 Mar 2023 | Tax Consulting | Call to discuss tax basis in the mining assets. EY: E. Sapir and E. Harvey. Celsius: J. Morgan and L. Koren. | 0.4 | \$1,250.00 | \$500.00 |
| Eric Sapir | Executive Director | 27 Mar 2023 | Tax Consulting | Revisions to mining asset basis calculation to take into account Company feedback. | 2.1 | \$1,150.00 | \$2,415.00 |
| Eric Sapir | Executive Director | 27 Mar 2023 | Tax Consulting | Call to discuss tax basis in the mining assets. EY: E. Sapir and E. Harvey. Celsius: J. Morgan and L. Koren. | 0.4 | \$1,150.00 | \$460.00 |
| Elizabeth Harvey | Partner/Principal | 28 Mar 2023 | Tax Consulting | Weekly tax call to discuss revision to intercompany account balances and UK/US transfers. Kirkland: S. Cantor and M. Kandallu. Celsius: L. Koren and J. Morgan. Andersen: D. Seymour and S. Shears. EY: E. Sapir, E. Harvey, and Y. Shwartz. | 0.9 | \$1,250.00 | \$1,125.00 |
| Eric Sapir | Executive Director | 28 Mar 2023 | Tax Consulting | Weekly tax call to discuss revision to intercompany account balances and UK/US transfers. Kirkland: S. Cantor and M. Kandallu. Celsius: L. Koren and J. Morgan. Andersen: D. Seymour and S. Shears. EY: E. Sapir, E. Harvey, and Y. Shwartz. | 0.9 | \$1,150.00 | \$1,035.00 |

| Name | Title | Transaction Date | Project Category | Description | Hours | Hourly Rate | Fee |
|------------------|---------------------|------------------|------------------|---|-------|-------------|------------|
| Yoav Shwartz | Partner / Principal | 28 Mar 2023 | Tax Consulting | Weekly tax call to discuss revision to intercompany account balances and UK/US transfers. Kirkland: S. Cantor and M. Kandallu. Celsius: L. Koren and J. Morgan. Andersen: D. Seymour and S. Shears. EY: E. Sapir, E. Harvey, and Y. Shwartz. | 0.9 | \$1,250.00 | \$1,125.00 |
| Sam Weiler | Partner/Principal | 28 Mar 2023 | Tax Consulting | Review/response to cost recovery of crypto mining rig | 0.5 | \$1,250.00 | \$625.00 |
| Elizabeth Harvey | Partner/Principal | 29 Mar 2023 | Tax Consulting | Updates to mining tax basis schedule | 1.4 | \$1,250.00 | \$1,750.00 |
| Elizabeth Harvey | Partner/Principal | 04 Apr 2023 | Tax Consulting | Weekly call to discuss deal update. Kirkland: S. Cantor and M. Kandallu. Celsius: L. Koren. Andersen: D. Seymour and H. Griffiths.EY: E. Sapir, E. Harvey, and Y. Shwartz. | 0.1 | \$1,250.00 | \$125.00 |
| Eric Sapir | Executive Director | 04 Apr 2023 | Tax Consulting | Weekly call to discuss deal update. Kirkland: S. Cantor and M. Kandallu. Celsius: L. Koren. Andersen: D. Seymour and H. Griffiths.EY: E. Sapir, E. Harvey, and Y. Shwartz. | 0.1 | \$1,150.00 | \$115.00 |
| Yoav Shwartz | Partner / Principal | 04 Apr 2023 | Tax Consulting | Weekly call to discuss deal update. Kirkland: S. Cantor and M. Kandallu. Celsius: L. Koren. Andersen: D. Seymour and H. Griffiths.EY: E. Sapir, E. Harvey, and Y. Shwartz. | 0.1 | \$1,250.00 | \$125.00 |
| Russell Carr | Partner/Principal | 13 Apr 2023 | Tax Consulting | Analysis of tax issues related to non-US transfers in 2021. | 2.8 | \$1,250.00 | \$3,500.00 |
| Elizabeth Harvey | Partner/Principal | 13 Apr 2023 | Tax Consulting | Call to discuss status of updated balance sheets to perform gain/loss calculation. EY: E. Sapir, E. Harvey, Y. Shwartz, and J. Hill. Kirkland: A. Sexton and S. Cantor. Celsius: J. Morgan and L. Koren. Andersen: D. Seymour, H. Griffiths, and S. Shears. | 0.5 | \$1,250.00 | \$625.00 |

| Name | Title | Transaction Date | Project Category | Description | Hours | Hourly Rate | Fee |
|------------------|---------------------|------------------|------------------|--|-------|-------------|------------|
| Jeff Hill | Partner/Principal | 13 Apr 2023 | Tax Consulting | Call to discuss status of updated balance sheets to perform gain/loss calculation. EY: E. Sapir, E. Harvey, Y. Shwartz, and J. Hill. Kirkland: A. Sexton and S. Cantor. Celsius: J. Morgan and L. Koren. Andersen: D. Seymour, H. Griffiths, and S. Shears. | 0.5 | \$1,250.00 | \$625.00 |
| Eric Sapir | Executive Director | 13 Apr 2023 | Tax Consulting | Call to discuss status of updated balance sheets to perform gain/loss calculation. EY: E. Sapir, E. Harvey, Y. Shwartz, and J. Hill. Kirkland: A. Sexton and S. Cantor. Celsius: J. Morgan and L. Koren. Andersen: D. Seymour, H. Griffiths, and S. Shears. | 0.5 | \$1,150.00 | \$575.00 |
| Yoav Shwartz | Partner / Principal | 13 Apr 2023 | Tax Consulting | Call to discuss status of updated balance sheets to perform gain/loss calculation. EY: E. Sapir, E. Harvey, Y. Shwartz, and J. Hill. Kirkland: A. Sexton and S. Cantor. Celsius: J. Morgan and L. Koren. Andersen: D. Seymour, H. Griffiths, and S. Shears. | 0.5 | \$1,250.00 | \$625.00 |
| Russell Carr | Partner/Principal | 14 Apr 2023 | Tax Consulting | Analysis of tax issues regarding UK restructuring. | 1.6 | \$1,250.00 | \$2,000.00 |
| Russell Carr | Partner/Principal | 14 Apr 2023 | Tax Consulting | Review of calculation to support substantially all test on UK restructuring transaction. | 2.9 | \$1,250.00 | \$3,625.00 |
| Elizabeth Harvey | Partner/Principal | 18 Apr 2023 | Tax Consulting | Weekly call to discuss defi liability changes between 2021 and 2022 and property tax interest and penalties. Kirkland: A. Sexton, S. Cantor, and M. Kandallu. Celsius: L. Koren and J. Morgan. Andersen: H. Griffiths, S. Shears, D. Seymour, and Z. Wyatt. EY: E. Harvey, N. Flagg, Y. Shwartz, and E. Sapir. | 0.7 | \$1,250.00 | \$875.00 |
| Eric Sapir | Executive Director | 18 Apr 2023 | Tax Consulting | Weekly call to discuss defi liability changes between 2021 and 2022 and property tax interest and penalties. Kirkland: A. Sexton, S. Cantor, and M. Kandallu. Celsius: L. Koren and J. Morgan. Andersen: H. Griffiths, S. Shears, D. Seymour, and Z. Wyatt. EY: E. Harvey, N. Flagg, Y. Shwartz, and E. Sapir. | 0.7 | \$1,150.00 | \$805.00 |

| Name | Title | Transaction Date | Project Category | Description | Hours | Hourly Rate | Fee |
|-----------------|---------------------|------------------|------------------|--|-------|-------------|------------|
| Yoav Shwartz | Partner / Principal | 18 Apr 2023 | Tax Consulting | Weekly call to discuss defi liability changes between 2021 and 2022 and property tax interest and penalties. Kirkland: A. Sexton, S. Cantor, and M. Kandallu. Celsius: L. Koren and J. Morgan. Andersen: H. Griffiths, S. Shears, D. Seymour, and Z. Wyatt. EY: E. Harvey, N. Flagg, Y. Shwartz, and E. Sapir. | 0.7 | \$1,250.00 | \$875.00 |
| Russell Carr | Partner/Principal | 19 Apr 2023 | Tax Consulting | Additional analysis of tax issues related to UK restructuring. | 1.4 | \$1,250.00 | \$1,750.00 |
| Russell Carr | Partner/Principal | 20 Apr 2023 | Tax Consulting | Call to discuss historic international tax analysis and supporting calculations. EY: Y. Shwartz, R. Carr, J. Ryan, M. Tuchinsky, E. Diner, and E. Sapir. | 1.1 | \$1,250.00 | \$1,375.00 |
| Russell Carr | Partner/Principal | 20 Apr 2023 | Tax Consulting | Review of international tax model. | 2.7 | \$1,250.00 | \$3,375.00 |
| Joe Ryan | Senior Manager | 20 Apr 2023 | Tax Consulting | Review of international tax analysis model and supporting materials. | 0.9 | \$950.00 | \$855.00 |
| Joe Ryan | Senior Manager | 20 Apr 2023 | Tax Consulting | Call to discuss historic international tax analysis and supporting calculations. EY: Y. Shwartz, R. Carr, J. Ryan, M. Tuchinsky, E. Diner, and E. Sapir. | 1.1 | \$950.00 | \$1,045.00 |
| Eric Sapir | Executive Director | 20 Apr 2023 | Tax Consulting | Call to discuss historic international tax analysis and supporting calculations. EY: Y. Shwartz, R. Carr, J. Ryan, M. Tuchinsky, E. Diner, and E. Sapir. | 1.1 | \$1,150.00 | \$1,265.00 |
| Yoav Shwartz | Partner / Principal | 20 Apr 2023 | Tax Consulting | Call to discuss historic international tax analysis and supporting calculations. EY: Y. Shwartz, R. Carr, J. Ryan, M. Tuchinsky, E. Diner, and E. Sapir. | 1.1 | \$1,250.00 | \$1,375.00 |
| Maria Tuchinsky | Senior Manager | 20 Apr 2023 | Tax Consulting | Preparation of International Tax model in connection with the 2021 restructuring | 2.2 | \$950.00 | \$2,090.00 |
| Maria Tuchinsky | Senior Manager | 20 Apr 2023 | Tax Consulting | US International Tax analysis in connection with the 2021 restructuring - updates to functional analysis | 1.8 | \$950.00 | \$1,710.00 |
| Maria Tuchinsky | Senior Manager | 20 Apr 2023 | Tax Consulting | Prepare reconciliation of historic international tax analysis and supporting calculations | 2.4 | \$950.00 | \$2,280.00 |

| Name | Title | Transaction Date | Project Category | Description | Hours | Hourly Rate | Fee |
|------------------|--------------------|------------------|------------------|--|-------|-------------|------------|
| Maria Tuchinsky | Senior Manager | 20 Apr 2023 | Tax Consulting | Call to discuss historic international tax analysis and supporting calculations. EY: Y. Schwartz, R. Carr, J. Ryan, M. Tuchinsky, E. Diner, and E. Sapir. | 1.1 | \$950.00 | \$1,045.00 |
| Elizabeth Harvey | Partner/Principal | 21 Apr 2023 | Tax Consulting | EY internal call in preparation for and followup to today's call with Client and Kirkland to discuss and review next step recommendations and timing requirements for compilation of schedules for Texas and Pennsylvania use tax claims and estimation of indirect tax costs related to bankruptcy emergence. Attendees: E. Harvey, E. Sapir, K. Gatt, N. Flagg | 1.1 | \$1,250.00 | \$1,375.00 |
| Elizabeth Harvey | Partner/Principal | 21 Apr 2023 | Tax Consulting | Call to seek Client and Kirkland input on status and required timing for compilation of Texas and Pennsylvania use tax schedules and asset data to support calculation of potential indirect tax costs related to bankruptcy emergence. Attendees: Celsius – J. Morgan, Kirkland – A. Sexton and S. Cantor, EY-E. Harvey, E. Sapir, K. Gatt, N. Flagg | 0.8 | \$1,250.00 | \$1,000.00 |
| Eric Sapir | Executive Director | 21 Apr 2023 | Tax Consulting | EY internal call in preparation for and followup to today's call with Client and Kirkland to discuss and review next step recommendations and timing requirements for compilation of schedules for Texas and Pennsylvania use tax claims and estimation of indirect tax costs related to bankruptcy emergence. Attendees: E. Harvey, E. Sapir, K. Gatt, N. Flagg | 1.1 | \$1,150.00 | \$1,265.00 |
| Eric Sapir | Executive Director | 21 Apr 2023 | Tax Consulting | Call to seek Client and Kirkland input on status and required timing for compilation of Texas and Pennsylvania use tax schedules and asset data to support calculation of potential indirect tax costs related to bankruptcy emergence. Attendees: Celsius – J. Morgan, Kirkland – A. Sexton and S. Cantor, EY-E. Harvey, E. Sapir, K. Gatt, N. Flagg | 0.8 | \$1,150.00 | \$920.00 |

| Name | Title | Transaction Date | Project Category | Description | Hours | Hourly Rate | Fee |
|---------------------|---------------------|------------------|------------------|--|-------|-------------|------------|
| Yoav Shwartz | Partner / Principal | 23 Apr 2023 | Tax Consulting | Review of International Tax model and functional analysis | 1.9 | \$1,250.00 | \$2,375.00 |
| Yoav Shwartz | Partner / Principal | 24 Apr 2023 | Tax Consulting | Continued Review of International Tax model and functional analysis | 2.1 | \$1,250.00 | \$2,625.00 |
| Maria Tuchinsky | Senior Manager | 24 Apr 2023 | Tax Consulting | Review and insert Celsius cap tables to International Tax Model | 1.4 | \$950.00 | \$1,330.00 |
| Maria Tuchinsky | Senior Manager | 25 Apr 2023 | Tax Consulting | Review and adjust all support tabs in the International Tax Model | 2.8 | \$950.00 | \$2,660.00 |
| Maria Tuchinsky | Senior Manager | 25 Apr 2023 | Tax Consulting | Update properties fraction to adjust for third party investors and update to functional analysis in the International Tax Model | 1.6 | \$950.00 | \$1,520.00 |
| Eric Sapir | Executive Director | 26 Apr 2023 | Tax Consulting | Review public filings for updated information. | 1.2 | \$1,150.00 | \$1,380.00 |
| Elizabeth Harvey | Partner/Principal | 27 Apr 2023 | Tax Consulting | Weekly call to discuss auction status and potential emergence alternatives. Kirkland: A. Sexton and S. Cantor. Celsius: J. Morgan and L. Koren. Andersen: Z. Wyatt, D. Seymour, and S. Shears. EY: E. Harvey, Y. Shwartz, and E. Sapir | 0.2 | \$1,250.00 | \$250.00 |
| Eric Sapir | Executive Director | 27 Apr 2023 | Tax Consulting | Weekly call to discuss auction status and potential emergence alternatives. Kirkland: A. Sexton and S. Cantor. Celsius: J. Morgan and L. Koren. Andersen: Z. Wyatt, D. Seymour, and S. Shears. EY: E. Harvey, Y. Shwartz, and E. Sapir | 0.2 | \$1,150.00 | \$230.00 |
| Yoav Shwartz | Partner / Principal | 27 Apr 2023 | Tax Consulting | Weekly call to discuss auction status and potential emergence alternatives. Kirkland: A. Sexton and S. Cantor. Celsius: J. Morgan and L. Koren. Andersen: Z. Wyatt, D. Seymour, and S. Shears. EY: E. Harvey, Y. Shwartz, and E. Sapir | 0.2 | \$1,250.00 | \$250.00 |
| Yoav Shwartz | Partner / Principal | 30 Apr 2023 | Tax Consulting | Review of International Tax model and properties fraction | 2.3 | \$1,250.00 | \$2,875.00 |
| Harvey,Elizabeth R. | Partner/Principal | 01 May 2023 | Tax Consulting | Reviewing updated parties in interest list (PHIL) for court disclosure | 0.7 | \$1,250.00 | \$875.00 |

| Name | Title | Transaction Date | Project Category | Description | Hours | Hourly Rate | Fee |
|---------------------|--------------------|------------------|------------------|---|-------|-------------|------------|
| Shwartz, Yoav | Partner/Principal | 01 May 2023 | Tax Consulting | International Tax model - update data with regards to workforce, intellectual property and real property | 2.7 | \$1,250.00 | \$3,375.00 |
| Shwartz, Yoav | Partner/Principal | 01 May 2023 | Tax Consulting | International Tax model - update calculations considering elimination of 3rd party investors | 2.4 | \$1,250.00 | \$3,000.00 |
| Shwartz, Yoav | Partner/Principal | 03 May 2023 | Tax Consulting | Final review of international tax model | 2.1 | \$1,250.00 | \$2,625.00 |
| Carr,Russell | Partner/Principal | 04 May 2023 | Tax Consulting | Review updated model regarding 2021 transfer and analysis of related international tax issues | 2.9 | \$1,250.00 | \$3,625.00 |
| Shwartz, Yoav | Partner/Principal | 04 May 2023 | Tax Consulting | Final review of international tax model - Day 2 | 1.6 | \$1,250.00 | \$2,000.00 |
| Sapir,Eric | Executive Director | 09 May 2023 | Tax Consulting | Weekly tax call to discuss updated balance sheet status. Kirkland: S. Cantor, M. Kandallu, and A. Sexton. Celsius: L. Koren and J. Morgan. Andersen: D. Seymour and S. Shears. EY: N. Flagg, Y. Shwartz, and E. Sapir. | 0.3 | \$1,150.00 | \$345.00 |
| Shwartz, Yoav | Partner/Principal | 09 May 2023 | Tax Consulting | Weekly tax call to discuss updated balance sheet status. Kirkland: S. Cantor, M. Kandallu, and A. Sexton. Celsius: L. Koren and J. Morgan. Andersen: D. Seymour and S. Shears. EY: N. Flagg, Y. Shwartz, and E. Sapir. | 0.3 | \$1,250.00 | \$375.00 |
| Tuchinsky, Maria | Senior Manager | 22 May 2023 | Tax Consulting | Prepare reconciliation of historic international tax analysis and supporting calculations | 2.5 | \$950.00 | \$2,375.00 |
| Harvey,Elizabeth R. | Partner/Principal | 23 May 2023 | Tax Consulting | Weekly tax call to discuss transfer pricing and auction details. Kirkland: A. Sexton, S. Cantor, and M. Kandallu. Celsius: L. Koren and J. Morgan. Andersen: S. Shears and D. Seymour. EY: E. Harvey, Y. Shwartz, and E. Sapir. | 0.3 | \$1,250.00 | \$375.00 |
| Sapir,Eric | Executive Director | 23 May 2023 | Tax Consulting | Weekly tax call to discuss transfer pricing and auction details. Kirkland: A. Sexton, S. Cantor, and M. Kandallu. Celsius: L. Koren and J. Morgan. Andersen: S. Shears and D. Seymour. EY: E. Harvey, Y. Shwartz, and E. Sapir. | 0.3 | \$1,150.00 | \$345.00 |

| Name | Title | Transaction Date | Project Category | Description | Hours | Hourly Rate | Fee |
|---------------------|--------------------|------------------|------------------|---|-------|-------------|------------|
| Harvey,Elizabeth R. | Partner/Principal | 30 May 2023 | Tax Consulting | Weekly tax call to discuss auction status and tax considerations. Kirkland: S. Cantor, M. Kandallu, and A. Sexton. Celsius: L. Koren and J. Morgan. Andersen: D. Seymour and S. Shears. EY: N. Flagg, Y. Shwartz, E. Harvey, and E. Sapir. | 0.4 | \$1,250.00 | \$500.00 |
| Sapir,Eric | Executive Director | 30 May 2023 | Tax Consulting | Weekly tax call to discuss auction status and tax considerations. Kirkland: S. Cantor, M. Kandallu, and A. Sexton. Celsius: L. Koren and J. Morgan. Andersen: D. Seymour and S. Shears. EY: N. Flagg, Y. Shwartz, E. Harvey, and E. Sapir. | 0.4 | \$1,150.00 | \$460.00 |
| Shwartz, Yoav | Partner/Principal | 30 May 2023 | Tax Consulting | Weekly tax call to discuss auction status and tax considerations. Kirkland: S. Cantor, M. Kandallu, and A. Sexton. Celsius: L. Koren and J. Morgan. Andersen: D. Seymour and S. Shears. EY: N. Flagg, Y. Shwartz, E. Harvey, and E. Sapir. | 0.4 | \$1,250.00 | \$500.00 |
| Harvey,Elizabeth R. | Partner/Principal | 01 Jun 2023 | Tax Consulting | Fee examiner report - review and prepare response for review by EY General Counsel | 1.4 | \$1,250.00 | \$1,750.00 |
| Shwartz, Yoav | Partner/Principal | 02 Jun 2023 | Tax Consulting | Call with L. Koren (Company) and M. Tuchinsky (EY) to discuss 2022 tax compliance process, 2021 tax return amendments and tax provision WP review | 0.9 | \$1,250.00 | \$1,125.00 |
| Tuchinsky, Maria | Senior Manager | 02 Jun 2023 | Tax Consulting | Call with L. Koren (Company) and Y. Shwartz (EY) to discuss 2022 tax compliance process, 2021 tax return amendments and tax provision WP review | 0.9 | \$950.00 | \$855.00 |
| Harvey,Elizabeth R. | Partner/Principal | 06 Jun 2023 | Tax Consulting | Weekly tax call to discuss sales tax updates and balance sheet status. Kirkland: M. Kandallu, and A. Sexton. Celsius: L. Koren and J. Morgan. Andersen: D. Seymour, Z. Wyatt, and S. Shears. EY: N. Flagg, Y. Shwartz, E. Harvey, and E. Sapir. | 0.3 | \$1,250.00 | \$375.00 |

| Name | Title | Transaction Date | Project Category | Description | Hours | Hourly Rate | Fee |
|----------------------|--------------------|------------------|------------------|--|-------|-------------|------------|
| Sapir, Eric | Executive Director | 06 Jun 2023 | Tax Consulting | Weekly tax call to discuss sales tax updates and balance sheet status. Kirkland: M. Kandallu, and A. Sexton. Celsius: L. Koren and J. Morgan. Andersen: D. Seymour, Z. Wyatt, and S. Shears. EY: N. Flagg, Y. Schwartz, E. Harvey, and E. Sapir. | 0.3 | \$1,150.00 | \$345.00 |
| Shwartz, Yoav | Partner/Principal | 06 Jun 2023 | Tax Consulting | Weekly tax call to discuss sales tax updates and balance sheet status. Kirkland: M. Kandallu, and A. Sexton. Celsius: L. Koren and J. Morgan. Andersen: D. Seymour, Z. Wyatt, and S. Shears. EY: N. Flagg, Y. Schwartz, E. Harvey, and E. Sapir. | 0.3 | \$1,250.00 | \$375.00 |
| Shwartz, Yoav | Partner/Principal | 11 Jun 2023 | Tax Consulting | Tax call with L. Koren (Company) and M. Tuchinsky (EY) to discuss transfer pricing workstream update and support required from EY Israel audit team in connection with emergence. | 0.6 | \$1,250.00 | \$750.00 |
| Tuchinsky, Maria | Senior Manager | 11 Jun 2023 | Tax Consulting | Tax call with L. Koren (Company) and Y. Shwartz (EY) to discuss transfer pricing workstream update and support required from EY Israel audit team in connection with emergence. | 0.6 | \$950.00 | \$570.00 |
| Harvey, Elizabeth R. | Partner/Principal | 15 Jun 2023 | Tax Consulting | Reviewing 2021 mining schedules for provision workstream | 0.8 | \$1,250.00 | \$1,000.00 |
| Harvey, Elizabeth R. | Partner/Principal | 20 Jun 2023 | Tax Consulting | Weekly tax call to discuss treatment of administrative tax claims in the proposed transaction. Kirkland: M. Kandallu, S. Cantor, and A. Sexton. Celsius: L. Koren. Andersen: D. Seymour and S. Shears. EY: N. Flagg, Y. Schwartz, E. Harvey, and E. Sapir. | 0.4 | \$1,250.00 | \$500.00 |
| Sapir, Eric | Executive Director | 20 Jun 2023 | Tax Consulting | Weekly tax call to discuss treatment of administrative tax claims in the proposed transaction. Kirkland: M. Kandallu, S. Cantor, and A. Sexton. Celsius: L. Koren. Andersen: D. Seymour and S. Shears. EY: N. Flagg, Y. Schwartz, E. Harvey, and E. Sapir. | 0.4 | \$1,150.00 | \$460.00 |

| Name | Title | Transaction Date | Project Category | Description | Hours | Hourly Rate | Fee |
|---------------------|--------------------|------------------|------------------|---|-------|-------------|------------|
| Shwartz, Yoav | Partner/Principal | 20 Jun 2023 | Tax Consulting | Celsius weekly tax update call to discuss administrative taxes and updates on state and property taxes. Kirkland: A. Sexton, S. Cantor, and M. Kandallu. Celsius: L. Koren. Andersen: S. Shears and D. Seymour. EY: | 0.4 | \$1,250.00 | \$500.00 |
| Shwartz, Yoav | Partner/Principal | 21 Jun 2023 | Tax Consulting | Final updates to international tax model based on updated data provided by Celsius | 2.2 | \$1,250.00 | \$2,750.00 |
| Shwartz, Yoav | Partner/Principal | 25 Jun 2023 | Tax Consulting | Tax call with L. Koren (Company) and M. Tuchinsky (EY) to discuss tax return preparation status, Bitwave updates, international tax issues relating to UK lending activity and dealer exception. | 0.7 | \$1,250.00 | \$875.00 |
| Tuchinsky, Maria | Senior Manager | 25 Jun 2023 | Tax Consulting | Tax call with L. Koren (Company) and Y. Shwartz (EY) to discuss tax return preparation status, Bitwave updates, international tax issues relating to UK lending activity and dealer exception. | 0.7 | \$950.00 | \$665.00 |
| Harvey,Elizabeth R. | Partner/Principal | 29 Jun 2023 | Tax Consulting | Weekly tax call to discuss substantive consolidation US federal income tax considerations. Kirkland: M. Kandallu, and A. Sexton. Celsius: L. Koren and J. Morgan. Andersen: H. Griffiths, D. Seymour and S. Shears. EY: K. Gatt, M. Tuchinsky, E. Harvey, and E. Sapir. | 0.5 | \$1,250.00 | \$625.00 |
| Sapir, Eric | Executive Director | 29 Jun 2023 | Tax Consulting | Weekly tax call to discuss substantive consolidation US federal income tax considerations. Kirkland: M. Kandallu, and A. Sexton. Celsius: L. Koren and J. Morgan. Andersen: H. Griffiths, D. Seymour and S. Shears. EY: K. Gatt, M. Tuchinsky, E. Harvey, and E. Sapir. | 0.5 | \$1,150.00 | \$575.00 |

| Name | Title | Transaction Date | Project Category | Description | Hours | Hourly Rate | Fee |
|------------------|----------------|------------------|------------------|---|--------------|-------------|---------------------|
| Tuchinsky, Maria | Senior Manager | 29 Jun 2023 | Tax Consulting | Weekly tax call to discuss substantive consolidation US federal income tax considerations. Kirkland: M. Kandallu, and A. Sexton. Celsius: L. Koren and J. Morgan. Andersen: H. Griffiths, D. Seymour and S. Shears. EY: K. Gatt, M. Tuchinsky, E. Harvey, and E. Sapir. | 0.5 | \$950.00 | \$475.00 |
| Total | | | | | 109.4 | | \$128,440.00 |

State and Local Tax Services

| Name | Title | Transaction Date | Project Category | Description | Hours | Hourly Rate | Fee |
|-------------------|--------------------|------------------|----------------------|---|-------|-------------|------------|
| Flagg,Nancy A. | Executive Director | 02 Mar 2023 | State Tax Consulting | Prepare open tax items list and next steps | 0.6 | \$1,150.00 | \$690.00 |
| Wehr,Robert W | Senior Manager | 02 Mar 2023 | State Tax Consulting | Oklahoma sales tax assistance review load management and cleaning proposal provided by client (J.Morgan) | 0.4 | \$950.00 | \$380.00 |
| Mitchell,Traci R. | Executive Director | 09 Mar 2023 | State Tax Consulting | emails regarding Wyoming state of incorporation questions | 0.6 | \$1,150.00 | \$690.00 |
| Flagg,Nancy A. | Executive Director | 15 Mar 2023 | State Tax Consulting | Call with client (J.Morgan) and R.Wehr to discuss Texas and other tax open items | 1.1 | \$1,150.00 | \$1,265.00 |
| Wehr,Robert W | Senior Manager | 15 Mar 2023 | State Tax Consulting | Call with client (J.Morgan) and N.Flagg to discuss Texas and other tax open items | 1.1 | \$950.00 | \$1,045.00 |
| Flagg,Nancy A. | Executive Director | 17 Mar 2023 | State Tax Consulting | Internal EY call with J.Hill to discuss Pennsylvania sales and use tax registration status | 0.4 | \$1,150.00 | \$460.00 |
| Hill,Jeanne L. | Senior Manager | 17 Mar 2023 | State Tax Consulting | Internal EY call with J.Hill to discuss Pennsylvania sales and use tax registration status | 0.4 | \$950.00 | \$380.00 |
| Flagg,Nancy A. | Executive Director | 20 Mar 2023 | State Tax Consulting | Internal EY call to discuss tax claims filed to date, including claims in excess of \$1million. Attendees: D. Johnson, N. Flagg and K. Gatt | 0.4 | \$1,150.00 | \$460.00 |
| Flagg,Nancy A. | Executive Director | 20 Mar 2023 | State Tax Consulting | Review bankruptcy tax claims list from company to determine next steps for claims log | 0.3 | \$1,150.00 | \$345.00 |

| Name | Title | Transaction Date | Project Category | Description | Hours | Hourly Rate | Fee |
|------------------------|--------------------|------------------|----------------------|--|-------|-------------|------------|
| Gatt,Katie | Senior Manager | 20 Mar 2023 | State Tax Consulting | Compile state tax code November December fee statement detail | 4.4 | \$950.00 | \$4,180.00 |
| Gatt,Katie | Senior Manager | 20 Mar 2023 | State Tax Consulting | Internal EY call to discuss tax claims filed to date, including claims in excess of \$1million. Attendees: D. Johnson, N. Flagg and K. Gatt | 0.4 | \$950.00 | \$380.00 |
| Johnson,Derrick Joseph | Staff/Assistant | 20 Mar 2023 | State Tax Consulting | Compile tax claims log reflecting detail (e.g., tax type, period(s), interest, etc.) per N.Flagg instructions | 3.7 | \$400.00 | \$1,480.00 |
| Johnson,Derrick Joseph | Staff/Assistant | 20 Mar 2023 | State Tax Consulting | Internal EY call to discuss tax claims filed to date, including claims in excess of \$1million. Attendees: D. Johnson, N. Flagg and K. Gatt | 0.4 | \$400.00 | \$160.00 |
| Flagg,Nancy A. | Executive Director | 21 Mar 2023 | State Tax Consulting | Call with client (J. Morgan) to discuss Pennsylvania sales and use tax registration and tax claim open items. EY attendees: N.Flagg, J.Hill | 1.4 | \$1,150.00 | \$1,610.00 |
| Flagg,Nancy A. | Executive Director | 21 Mar 2023 | State Tax Consulting | Internal EY call with J. Hill to confirm follow-ups and next steps per call with client (J.Morgan) | 0.2 | \$1,150.00 | \$230.00 |
| Hill,Jeanne L. | Senior Manager | 21 Mar 2023 | State Tax Consulting | Call with client (J. Morgan) to discuss Pennsylvania sales and use tax registration and tax claim open items. EY attendees: N.Flagg, J.Hill | 1.4 | \$950.00 | \$1,330.00 |
| Flagg,Nancy A. | Executive Director | 22 Mar 2023 | State Tax Consulting | Internal EY call to discuss bankruptcy status update, including fixed asset information required for federal tax calculations. Attendees: N.Flagg, E.Harvey, E.Sapir | 0.4 | \$1,150.00 | \$460.00 |
| Flagg,Nancy A. | Executive Director | 22 Mar 2023 | State Tax Consulting | Review files provided by client (J. Morgan) reflecting current fixed asset information to send to federal team | 0.6 | \$1,150.00 | \$690.00 |
| Hill,Jeanne L. | Senior Manager | 22 Mar 2023 | State Tax Consulting | Internal EY call with N.Flagg to confirm follow-ups and next steps per call with client (J.Morgan) | 0.2 | \$950.00 | \$190.00 |
| Lubic,Jake | Staff/Assistant | 23 Mar 2023 | State Tax Consulting | Review and update tax claims detail log prepared by D.Johnson | 2.1 | \$400.00 | \$840.00 |
| Gatt,Katie | Senior Manager | 27 Mar 2023 | State Tax Consulting | Review January 2023 fee statement detail | 1.9 | \$950.00 | \$1,805.00 |

| Name | Title | Transaction Date | Project Category | Description | Hours | Hourly Rate | Fee |
|------------------------|--------------------|------------------|----------------------|--|-------|-------------|------------|
| Coleman,Jade J. | Staff/Assistant | 28 Mar 2023 | State Tax Consulting | Internal EY call to discuss detailed tax claims log master, including relevant claim details and alignment/prioritization open tax items and to-dos. Attendees: N. Flagg, K. Gatt, J. Coleman, E. Li, Z. Dryer, E. Gillenwater, A. Kapp, D. Johnson. | 0.2 | \$400.00 | \$80.00 |
| Flagg,Nancy A. | Executive Director | 28 Mar 2023 | State Tax Consulting | Internal EY call to discuss detailed tax claims log master, including relevant claim details and alignment/prioritization open tax items and to-dos. Attendees: N. Flagg, K. Gatt, J. Coleman, E. Li, Z. Dryer, E. Gillenwater, A. Kapp, D. Johnson. | 0.2 | \$1,150.00 | \$230.00 |
| Gatt,Katie | Senior Manager | 28 Mar 2023 | State Tax Consulting | Update November-December fee application per general counsel office | 0.9 | \$950.00 | \$855.00 |
| Gatt,Katie | Senior Manager | 28 Mar 2023 | State Tax Consulting | Internal EY call to discuss detailed tax claims log master, including relevant claim details and alignment/prioritization open tax items and to-dos. Attendees: N. Flagg, K. Gatt, J. Coleman, E. Li, Z. Dryer, E. Gillenwater, A. Kapp, D. Johnson. | 0.2 | \$950.00 | \$190.00 |
| Gatt,Katie | Senior Manager | 28 Mar 2023 | State Tax Consulting | Review February 2023 fee statement detail | 1.2 | \$950.00 | \$1,140.00 |
| Gillenwater,Emily | Senior | 28 Mar 2023 | State Tax Consulting | Internal EY call to discuss detailed tax claims log master, including relevant claim details and alignment/prioritization open tax items and to-dos. Attendees: N. Flagg, K. Gatt, J. Coleman, E. Li, Z. Dryer, E. Gillenwater, A. Kapp, D. Johnson. | 0.2 | \$600.00 | \$120.00 |
| Johnson,Derrick Joseph | Staff/Assistant | 28 Mar 2023 | State Tax Consulting | Internal EY call to discuss detailed tax claims log master, including relevant claim details and alignment/prioritization open tax items and to-dos. Attendees: N. Flagg, K. Gatt, J. Coleman, E. Li, Z. Dryer, E. Gillenwater, A. Kapp, D. Johnson. | 0.2 | \$400.00 | \$80.00 |
| Kapp,Amanda Michele | Staff/Assistant | 28 Mar 2023 | State Tax Consulting | Internal EY call to discuss detailed tax claims log master, including relevant claim details and alignment/prioritization open tax items and to- | 0.2 | \$400.00 | \$80.00 |

| Name | Title | Transaction Date | Project Category | Description | Hours | Hourly Rate | Fee |
|-------------------------|--------------------|------------------|----------------------|--|-------|-------------|------------|
| | | | | dos. Attendees: N. Flagg, K. Gatt, J. Coleman, E. Li, Z. Dryer, E. Gillenwater, A. Kapp, D. Johnson. | | | |
| Li, Eric | Staff/Assistant | 28 Mar 2023 | State Tax Consulting | Internal EY call to discuss detailed tax claims log master, including relevant claim details and alignment/prioritization open tax items and to-dos. Attendees: N. Flagg, K. Gatt, J. Coleman, E. Li, Z. Dryer, E. Gillenwater, A. Kapp, D. Johnson. | 0.2 | \$400.00 | \$80.00 |
| Lubic, Jake | Staff/Assistant | 28 Mar 2023 | State Tax Consulting | Internal EY call to discuss detailed tax claims log master, including relevant claim details and alignment/prioritization open tax items and to-dos. Attendees: N. Flagg, K. Gatt, J. Coleman, E. Li, Z. Dryer, E. Gillenwater, A. Kapp, D. Johnson. | 0.2 | \$400.00 | \$80.00 |
| Gatt, Katie | Senior Manager | 30 Mar 2023 | State Tax Consulting | Finalize January-February fee application detail | 1.2 | \$950.00 | \$1,140.00 |
| Li, Eric | Staff/Assistant | 04 Apr 2023 | State Tax Consulting | Compile March 2023 fee statement detail | 4.5 | \$400.00 | \$1,800.00 |
| Flagg, Nancy A. | Executive Director | 06 Apr 2023 | State Tax Consulting | Respond to A. Sexton (Kirkland) on status of Pennsylvania and Texas sales and use tax resolutions and state transfer tax estimates related to plan emergence | 0.4 | \$1,150.00 | \$460.00 |
| Johnson, Derrick Joseph | Staff/Assistant | 06 Apr 2023 | State Tax Consulting | update and prioritize open items list in master tracker | 2.7 | \$400.00 | \$1,080.00 |
| Flagg, Nancy A. | Executive Director | 10 Apr 2023 | State Tax Consulting | Internal EY call with J. Lubic to discuss open tax items, including tax claims log revisions / updates | 0.3 | \$1,150.00 | \$345.00 |
| Lubic, Jake | Staff/Assistant | 10 Apr 2023 | State Tax Consulting | Review tax claims log prepared by D. Johnson in order to provide to client (J. Morgan) | 2.6 | \$400.00 | \$1,040.00 |
| Lubic, Jake | Staff/Assistant | 10 Apr 2023 | State Tax Consulting | Internal EY call with N. Flagg to discuss open tax items, including tax claims log revisions / updates | 0.3 | \$400.00 | \$120.00 |
| Wehr, Robert W | Senior Manager | 11 Apr 2023 | State Tax Consulting | Texas sales tax assistance review client (J. Morgan) email and reply with updated rates proposed | 1.0 | \$950.00 | \$950.00 |

| Name | Title | Transaction Date | Project Category | Description | Hours | Hourly Rate | Fee |
|----------------|--------------------|------------------|----------------------|---|-------|-------------|------------|
| Wehr,Robert W | Senior Manager | 13 Apr 2023 | State Tax Consulting | Research Texas sales tax taxability of security services and hosting services with repairs for client email | 0.6 | \$950.00 | \$570.00 |
| Flagg,Nancy A. | Executive Director | 16 Apr 2023 | State Tax Consulting | Email client (J.Morgan) list of bankruptcy tax claims, including summary by tax type and claim detail tracker attached along with list and next steps on Cherokee County North Carolina pre-petition property tax notice received | 1.3 | \$1,150.00 | \$1,495.00 |
| Flagg,Nancy A. | Executive Director | 17 Apr 2023 | State Tax Consulting | Call with client (J.Morgan) to discuss indirect tax open items status | 1.4 | \$1,150.00 | \$1,610.00 |
| Flagg,Nancy A. | Executive Director | 18 Apr 2023 | State Tax Consulting | Follow-up call with client (J. Morgan) to discuss open indirect tax items and next steps | 0.7 | \$1,150.00 | \$805.00 |
| Flagg,Nancy A. | Executive Director | 18 Apr 2023 | State Tax Consulting | Weekly tax call to discuss balance sheet and P&L status and updates on property and sales tax process. Kirkland: A. Sexton, S. Canto, and M. Kandallu. Celsius: L. Koren and J. Morgan. EY: E. Harvey, Y. Shwartz, N. Flagg, and E. Sapir. Andersen: H. Griffiths, S. Shears, D. Seymour, and Z. Wyatt. | 0.7 | \$1,150.00 | \$805.00 |
| Flagg,Nancy A. | Executive Director | 19 Apr 2023 | State Tax Consulting | Review Pennsylvania pre and post-petition claim amounts filed for review for comparison with J. Morgan (Celsius) separate calculations | 0.6 | \$1,150.00 | \$690.00 |
| Flagg,Nancy A. | Executive Director | 19 Apr 2023 | State Tax Consulting | Review Texas pre-petition claim amounts filed for review for comparison with J. Morgan (Celsius) separate calculations | 0.4 | \$1,150.00 | \$460.00 |
| Flagg,Nancy A. | Executive Director | 20 Apr 2023 | State Tax Consulting | Field question from S. Cantor (Kirkland) on potential transfer tax profile calculations | 0.2 | \$1,150.00 | \$230.00 |
| Flagg,Nancy A. | Executive Director | 20 Apr 2023 | State Tax Consulting | Respond to A. Sexton (Kirkland) on status of Pennsylvania and Texas sales and use tax resolutions and state transfer tax estimates related to plan emergence | 0.4 | \$1,150.00 | \$460.00 |
| Flagg,Nancy A. | Executive Director | 21 Apr 2023 | State Tax Consulting | Call to seek Client (J.Morgan) and Kirkland input on status and required timing for compilation of Texas and Pennsylvania use tax schedules and asset data to support calculation of potential indirect tax costs related to bankruptcy emergence. Attendees: Celsius – | 0.8 | \$1,150.00 | \$920.00 |

| Name | Title | Transaction Date | Project Category | Description | Hours | Hourly Rate | Fee |
|----------------|--------------------|------------------|----------------------|--|-------|-------------|------------|
| | | | | J. Morgan, Kirkland – A. Sexton and S. Cantor, EY-E. Harvey, E. Sapir, K. Gatt, N. Flagg | | | |
| Flagg,Nancy A. | Executive Director | 21 Apr 2023 | State Tax Consulting | Internal EY call in preparation for and follow-up to call with client and Kirkland to discuss and review next step recommendations and timing requirements for compilation of schedules for Texas and Pennsylvania use tax claims and estimation of indirect tax costs related to bankruptcy emergence. Attendees: E. Harvey, E. Sapir, K. Gatt, N. Flagg | 1.1 | \$1,150.00 | \$1,265.00 |
| Flagg,Nancy A. | Executive Director | 21 Apr 2023 | State Tax Consulting | Prioritize and assign post client call indirect tax items requiring follow-up to EY team | 0.2 | \$1,150.00 | \$230.00 |
| Flagg,Nancy A. | Executive Director | 21 Apr 2023 | State Tax Consulting | Set agenda for call with client (J.Morgan) and Kirkland to discuss open indirect tax items | 0.2 | \$1,150.00 | \$230.00 |
| Gatt,Katie | Senior Manager | 21 Apr 2023 | State Tax Consulting | Call to seek Client (J.Morgan) and Kirkland input on status and required timing for compilation of Texas and Pennsylvania use tax schedules and asset data to support calculation of potential indirect tax costs related to bankruptcy emergence. Attendees: Celsius – J. Morgan, Kirkland – A. Sexton and S. Cantor, EY-E. Harvey, E. Sapir, K. Gatt, N. Flagg | 0.8 | \$950.00 | \$760.00 |
| Gatt,Katie | Senior Manager | 21 Apr 2023 | State Tax Consulting | Internal EY call in preparation for and follow-up to call with client and Kirkland to discuss and review next step recommendations and timing requirements for compilation of schedules for Texas and Pennsylvania use tax claims and estimation of indirect tax costs related to bankruptcy emergence. Attendees: E. Harvey, E. Sapir, K. Gatt, N. Flagg | 1.1 | \$950.00 | \$1,045.00 |
| Gatt,Katie | Senior Manager | 21 Apr 2023 | State Tax Consulting | Review applicability of sales tax to transfer / sale of assets in Oklahoma, Texas, Georgia, Ohio, Pennsylvania, Montana | 1.7 | \$950.00 | \$1,615.00 |

| Name | Title | Transaction Date | Project Category | Description | Hours | Hourly Rate | Fee |
|----------------|--------------------|------------------|-------------------------|--|-------|-------------|------------|
| Flagg,Nancy A. | Executive Director | 23 Apr 2023 | State Tax Consulting | Review client (J. Morgan) mining asset location list to confirm current states and send the finalized list to K.Gatt | 0.3 | \$1,150.00 | \$345.00 |
| Wehr,Robert W | Senior Manager | 27 Apr 2023 | State Tax Consulting | Respond to email from client (J.Morgan) regarding the taxability of storage fees | 0.3 | \$950.00 | \$285.00 |
| Flagg,Nancy A. | Executive Director | 08 May 2023 | Indirect Tax Consulting | Call with client (J. Morgan) to discuss imposition of sales tax on asset sale and ability to obtain net book value of assets based on location in order to estimate state tax cost. EY attendees: N. Flagg, K. Gatt | 1.0 | \$1,150.00 | \$1,150.00 |
| Flagg,Nancy A. | Executive Director | 08 May 2023 | Indirect Tax Consulting | Follow-up with client (J. Morgan) on fixed asset information needed for transfer tax analysis. | 0.2 | \$1,150.00 | \$230.00 |
| Gatt,Katie | Senior Manager | 08 May 2023 | Indirect Tax Consulting | Call with client (J. Morgan) to discuss imposition of sales tax on asset sale and ability to obtain net book value of assets based on location in order to estimate state tax cost. EY attendees: N. Flagg, | 1.0 | \$950.00 | \$950.00 |
| Gatt,Katie | Senior Manager | 08 May 2023 | Indirect Tax Consulting | Compile March 1, 2023-April 30, 2023 fee application detail | 2.9 | \$950.00 | \$2,755.00 |
| Gatt,Katie | Senior Manager | 08 May 2023 | Indirect Tax Consulting | Email E. Harvey, N. Flagg, E. Sapir state sales tax occasional sale analysis for review | 1.4 | \$950.00 | \$1,330.00 |
| Flagg,Nancy A. | Executive Director | 09 May 2023 | Indirect Tax Consulting | Prepare and send status update of open indirect tax issues to A. Sexton (Kirkland) | 0.6 | \$1,150.00 | \$690.00 |
| Flagg,Nancy A. | Executive Director | 09 May 2023 | Indirect Tax Consulting | Weekly tax call to discuss updated balance sheet status. Kirkland: S. Cantor, M. Kandallu, and A. Sexton. Celsius: L. Koren and J. Morgan. Andersen: D. Seymour and S. Shears. EY: N. Flagg, Y. Shwartz, and E. Sapir. | 0.3 | \$1,150.00 | \$345.00 |
| Gatt,Katie | Senior Manager | 09 May 2023 | Indirect Tax Consulting | Compile March 1, 2023-April 30, 2023 fee application detail - Day 2 | 0.4 | \$950.00 | \$380.00 |
| Flagg,Nancy A. | Executive Director | 17 May 2023 | Indirect Tax | Call with client (J. Morgan) to discuss open tax issues, including withholding issue, transfer tax | 0.9 | \$1,150.00 | \$1,035.00 |

| Name | Title | Transaction Date | Project Category | Description | Hours | Hourly Rate | Fee |
|---------------------|--------------------|------------------|-------------------------|--|-------|-------------|----------|
| | | | Consulting | analysis, sales tax updates and status re payment of property tax. EY attendees: N. Flagg, | | | |
| Flagg,Nancy A. | Executive Director | 17 May 2023 | Indirect Tax Consulting | Identify and align EY employment/withholding tax subject matter specialist per client (J. Morgan) request | 0.3 | \$1,150.00 | \$345.00 |
| Gatt,Katie | Senior Manager | 17 May 2023 | Indirect Tax Consulting | Call with client (J. Morgan) to discuss open tax issues, including withholding issue, transfer tax analysis, sales tax updates and status re payment of property tax. EY attendees: N. Flagg, | 0.9 | \$950.00 | \$855.00 |
| Wehr,Robert W | Senior Manager | 17 May 2023 | Indirect Tax Consulting | Review Power Grid letter of intent and invoices to determine proper tax treatment under Texas sales tax statutes of items per client J. Morgan request and reply to client. | 0.7 | \$950.00 | \$665.00 |
| Flagg,Nancy A. | Executive Director | 18 May 2023 | Indirect Tax Consulting | Contact EY tax withholding subject matter specialist resource identified per client (J. Morgan) request to align availability for a call. | 0.2 | \$1,150.00 | \$230.00 |
| LaGarde,Stephen | Partner/Principal | 23 May 2023 | Indirect Tax Consulting | Call with client (J. Morgan, L. Koren) to discuss the crypto 401k and other Individual Retirement Account transfer distributions requirements and Taxpayer Identification Number matching in Sovos. EY attendees: K. Lowery, R. Walker, S. LaGarde, K. Wrenn | 0.5 | \$1,250.00 | \$625.00 |
| Lowery,Kristie L | Partner/Principal | 23 May 2023 | Indirect Tax Consulting | Call with client (J. Morgan, L. Koren) to discuss the crypto 401k and other Individual Retirement Account transfer distributions requirements and Taxpayer Identification Number matching in Sovos. EY attendees: K. Lowery, R. Walker, S. LaGarde, K. Wrenn | 0.5 | \$1,250.00 | \$625.00 |
| Wrenn,Kaitlin Doyle | Manager | 23 May 2023 | Indirect Tax Consulting | Call with client (J. Morgan, L. Koren) to discuss the crypto 401k and other Individual Retirement Account transfer distributions requirements and Taxpayer Identification Number matching in Sovos. EY attendees: K. Lowery, R. Walker, S. LaGarde, K. Wrenn | 0.5 | \$850.00 | \$425.00 |

| Name | Title | Transaction Date | Project Category | Description | Hours | Hourly Rate | Fee |
|----------------|--------------------|------------------|-------------------------|--|-------|-------------|------------|
| Flagg,Nancy A. | Executive Director | 26 May 2023 | Indirect Tax Consulting | Call with Client (J. Morgan) to discuss open tax items, including Texas request for additional information, determination of date for fixed assets, transfer tax analysis and other valuation issues. EY attendees: N. Flagg, | 1.4 | \$1,150.00 | \$1,610.00 |
| Gatt,Katie | Senior Manager | 26 May 2023 | Indirect Tax Consulting | Call with Client (J. Morgan) to discuss open tax items, including Texas request for additional information, determination of date for fixed assets, transfer tax analysis and other valuation issues. EY attendees: N. Flagg, | 1.4 | \$950.00 | \$1,330.00 |
| Flagg,Nancy A. | Executive Director | 30 May 2023 | Indirect Tax Consulting | Weekly tax call to discuss auction status and tax considerations. Kirkland: S. Cantor, M. Kandallu, and A. Sexton. Celsius: L. Koren and J. Morgan. Andersen: D. Seymour and S. Shears. EY: N. Flagg, Y. Shwartz, E. Harvey, and E. Sapir. | 0.4 | \$1,150.00 | \$460.00 |
| Flagg,Nancy A. | Executive Director | 01 Jun 2023 | Indirect Tax Consulting | Call with client (J. Morgan) to discuss open indirect bankruptcy tax items, including Texas sales and use tax estimate, state transfer tax estimate calculation, Pennsylvania sales and use tax claim review and property tax liability. EY attendees: N. Flagg, | 1.3 | \$1,150.00 | \$1,495.00 |
| Gatt,Katie | Senior Manager | 01 Jun 2023 | Indirect Tax Consulting | Call with client (J. Morgan) to discuss open indirect bankruptcy tax items, including Texas sales and use tax estimate, state transfer tax estimate calculation, Pennsylvania sales and use tax claim review and property tax liability. EY attendees: N. Flagg, | 1.3 | \$950.00 | \$1,235.00 |
| Li,Eric | Staff/Assistant | 02 Jun 2023 | Indirect Tax Consulting | Pulling Celsius 5/1-5/26 time detail, draft May fee summary file and send to K. Gatt for review. Reconcile time entries with meeting log, clarify time entries with team members | 2.0 | \$400.00 | \$800.00 |
| Flagg,Nancy A. | Executive Director | 06 Jun 2023 | Indirect Tax Consulting | Weekly tax call to discuss sales tax updates and balance sheet status. Kirkland: M. Kandallu, and A. Sexton. Celsius: L. Koren and J. Morgan. Andersen: D. Seymour, Z. Wyatt, and S. Shears. EY: N. Flagg, Y. Shwartz, E. Harvey, and E. Sapir. | 0.3 | \$1,150.00 | \$345.00 |

| Name | Title | Transaction Date | Project Category | Description | Hours | Hourly Rate | Fee |
|----------------|--------------------|------------------|-------------------------|--|-------|-------------|------------|
| Gatt,Katie | Senior Manager | 06 Jun 2023 | Indirect Tax Consulting | Review fixed asset listing location detail provided by client (J. Morgan) and calculate estimated transfer tax liability based on net book value | 1.9 | \$950.00 | \$1,805.00 |
| Buonaguro,Paul | Manager | 07 Jun 2023 | Indirect Tax Consulting | Email client (J. Morgan) response re Pennsylvania tax base (e.g., cost or fair market value) for use tax remitted | 0.7 | \$850.00 | \$595.00 |
| Flagg,Nancy A. | Executive Director | 07 Jun 2023 | Indirect Tax Consulting | Call with client (J. Morgan) to discuss Pennsylvania sales tax analysis, transfer tax estimate. EY attendees: N. Flagg, | 1.3 | \$1,150.00 | \$1,495.00 |
| Flagg,Nancy A. | Executive Director | 07 Jun 2023 | Indirect Tax Consulting | Review status of Pennsylvania sales and use tax issues, tax claim filed, pre- vs post-petition tax liability and base tax imposed. | 0.3 | \$1,150.00 | \$345.00 |
| Gatt,Katie | Senior Manager | 07 Jun 2023 | Indirect Tax Consulting | Call with client (J. Morgan) to discuss Pennsylvania sales tax analysis, transfer tax estimate. EY attendees: N. Flagg, | 1.3 | \$950.00 | \$1,235.00 |
| Buonaguro,Paul | Manager | 09 Jun 2023 | Indirect Tax Consulting | EY New York state desk reply to N. Flagg, to provide input on sales tax implication and potential exemptions re deployment of rigs in New York. | 0.2 | \$850.00 | \$170.00 |
| Buonaguro,Paul | Manager | 12 Jun 2023 | Indirect Tax Consulting | Call with client (J. Morgan, L. Koren) to discuss sales tax implication and potential exemptions re deployment of rigs in New York and Pennsylvania sales tax liability. EY Attendees: N. Flagg, P. Buonaguro, | 1.0 | \$850.00 | \$850.00 |
| Buonaguro,Paul | Manager | 12 Jun 2023 | Indirect Tax Consulting | EY New York and Pennsylvania state desk research on potential sales tax exemptions applicable to deployment of rigs in New York and tax base for Pennsylvania sales tax liability per client (J. Morgan) request | 0.8 | \$850.00 | \$680.00 |
| Flagg,Nancy A. | Executive Director | 12 Jun 2023 | Indirect Tax Consulting | Call with client (J. Morgan, L. Koren) to discuss sales tax implication and potential exemptions re deployment of rigs in New York and Pennsylvania sales tax liability. EY Attendees: N. Flagg, P. Buonaguro, | 1.0 | \$1,150.00 | \$1,150.00 |

| Name | Title | Transaction Date | Project Category | Description | Hours | Hourly Rate | Fee |
|-------------------|--------------------|------------------|-------------------------|--|-------|-------------|------------|
| Flagg,Nancy A. | Executive Director | 12 Jun 2023 | Indirect Tax Consulting | Internal EY call to discuss applicability of and requirements for Oklahoma computer services sales tax exemption and potential tax liability associated with asset sale. Attendees: N. Flagg, R. Wehr, | 0.8 | \$1,150.00 | \$920.00 |
| Gatt,Katie | Senior Manager | 12 Jun 2023 | Indirect Tax Consulting | Call with client (J. Morgan, L. Koren) to discuss sales tax implication and potential exemptions re deployment of rigs in New York and Pennsylvania sales tax liability. EY Attendees: N. Flagg, P. Buonaguro, | 1.0 | \$950.00 | \$950.00 |
| Gatt,Katie | Senior Manager | 12 Jun 2023 | Indirect Tax Consulting | Internal EY call to discuss applicability of and requirements for Oklahoma computer services sales tax exemption and potential tax liability associated with asset sale. Attendees: N. Flagg, R. Wehr, | 0.8 | \$950.00 | \$760.00 |
| Wehr,Robert W | Senior Manager | 12 Jun 2023 | Indirect Tax Consulting | Internal EY call to discuss applicability of and requirements for Oklahoma computer services related exemption and potential tax liability associated with asset sale. Attendees: N. Flagg, K. Gatt, R. Wehr | 0.8 | \$950.00 | \$760.00 |
| Wehr,Robert W | Senior Manager | 14 Jun 2023 | Indirect Tax Consulting | EY Oklahoma state desk research and reply to client (J. Morgan) inquiry related to applicability of temporary storage exemptions applicable in Oklahoma and Alabama applicable to rigs relocated from Texas. | 0.5 | \$950.00 | \$475.00 |
| Flagg,Nancy A. | Executive Director | 15 Jun 2023 | Indirect Tax Consulting | Email EY Alabama State Desk (M. Wasser) per client (J. Morgan) request related to Alabama temporary storage exemption for sales tax, and forward response to client (J. Morgan) | 0.3 | \$1,150.00 | \$345.00 |
| Wasser,Michael J. | Executive Director | 15 Jun 2023 | Indirect Tax Consulting | EY sales tax desk research and reply to Gatt, N. Flagg re Alabama, Georgia and Tennessee temporary exemptions available for rigs transferred from Texas per client (J. Morgan) request. | 1.0 | \$1,150.00 | \$1,150.00 |

| Name | Title | Transaction Date | Project Category | Description | Hours | Hourly Rate | Fee |
|------------------------|--------------------|------------------|-------------------------|--|-------|-------------|------------|
| Johnson,Derrick Joseph | Staff/Assistant | 19 Jun 2023 | Indirect Tax Consulting | Review schedule of tax claims filed, identify updated claims and review the proof of claim form and details related to amounts, tax and periods claimed for discussion with client (J. Morgan) | 5.6 | \$400.00 | \$2,240.00 |
| Flagg,Nancy A. | Executive Director | 20 Jun 2023 | Indirect Tax Consulting | Weekly tax call to discuss treatment of administrative tax claims in the proposed transaction. Kirkland: M. Kandallu, S. Cantor, and A. Sexton. Celsius: L. Koren. Andersen: D. Seymour and S. Shears. EY: N. Flagg, Y. Schwartz, E. Harvey, and E. Sapir. | 0.4 | \$1,150.00 | \$460.00 |
| Buonaguro,Paul | Manager | 21 Jun 2023 | Indirect Tax Consulting | EY New York and Pennsylvania state desk research technical advisory opinions issued by New York Department of Taxation and Finance and consider applicability to rigs deployed in New York and review client (J. Morgan) Pennsylvania workpaper related to pre- vs post-petition use tax due on rigs | 1.2 | \$850.00 | \$1,020.00 |
| Flagg,Nancy A. | Executive Director | 21 Jun 2023 | Indirect Tax Consulting | Call with client (J. Morgan) to discuss sales and use tax open items and next steps. EY Attendees: R. Wehr, N. Flagg and K. Gatt | 1.7 | \$1,150.00 | \$1,955.00 |
| Flagg,Nancy A. | Executive Director | 21 Jun 2023 | Indirect Tax Consulting | Call with client (L. Koren, J. Morgan) to discuss leaseco structure and value proposition and sales tax storage exemptions. EY Attendees: N. Flagg, | 1.0 | \$1,150.00 | \$1,150.00 |
| Flagg,Nancy A. | Executive Director | 21 Jun 2023 | Indirect Tax Consulting | Email EY Texas franchise tax desk (J. Bowden) regarding Texas attorney general's franchise tax liability assertion and requestion assistance to resolve. | 0.2 | \$1,150.00 | \$230.00 |
| Flagg,Nancy A. | Executive Director | 21 Jun 2023 | Indirect Tax Consulting | Email reply to S. Cantor (Kirkland) request for indirect tax status update | 0.2 | \$1,150.00 | \$230.00 |
| Flagg,Nancy A. | Executive Director | 21 Jun 2023 | Indirect Tax Consulting | Internal EY call with EY Texas and Oklahoma sales and use tax state desk to discuss applicable temporary storage exemptions for rigs relocated from Texas. EY attendees: R. Wehr, K. Gatt, N. Flagg | 0.5 | \$1,150.00 | \$575.00 |

| Name | Title | Transaction Date | Project Category | Description | Hours | Hourly Rate | Fee |
|----------------|--------------------|------------------|-------------------------|--|-------|-------------|------------|
| Gatt,Katie | Senior Manager | 21 Jun 2023 | Indirect Tax Consulting | Call with client (J. Morgan) to discuss sales and use tax open items and next steps. EY Attendees: R. Wehr, N. Flagg and K. Gatt | 1.7 | \$950.00 | \$1,615.00 |
| Gatt,Katie | Senior Manager | 21 Jun 2023 | Indirect Tax Consulting | Call with client (L. Koren, J. Morgan) to discuss leaseco structure and value proposition and sales tax storage exemptions. EY Attendees: N. Flagg, | 1.0 | \$950.00 | \$950.00 |
| Gatt,Katie | Senior Manager | 21 Jun 2023 | Indirect Tax Consulting | Internal EY call with EY Texas and Oklahoma sales and use tax state desk to discuss applicable temporary storage exemptions for rigs relocated from Texas. EY attendees: R. Wehr, K. Gatt, N. Flagg | 0.5 | \$950.00 | \$475.00 |
| Wehr,Robert W | Senior Manager | 21 Jun 2023 | Indirect Tax Consulting | Call with client (J. Morgan) to discuss sales and use tax open items and next steps. EY Attendees: R. Wehr, N. Flagg and K. Gatt | 0.9 | \$950.00 | \$855.00 |
| Wehr,Robert W | Senior Manager | 21 Jun 2023 | Indirect Tax Consulting | Internal EY call with EY Texas and Oklahoma sales and use tax state desk to discuss applicable temporary storage exemptions for rigs relocated from Texas. EY attendees: R. Wehr, K. Gatt, N. Flagg | 0.5 | \$950.00 | \$475.00 |
| Buonaguro,Paul | Manager | 22 Jun 2023 | Indirect Tax Consulting | Call with client (L. Koren, J. Morgan) to discuss applicability of New York sales tax exemptions to each of three scenarios identified and estimated Pennsylvania sales tax liability. EY Attendees: N. Flagg, P. Buonaguro, | 0.9 | \$850.00 | \$765.00 |
| Buonaguro,Paul | Manager | 22 Jun 2023 | Indirect Tax Consulting | Internal EY call to discuss applicability to New York sales tax exemption for retail sales to transaction. Attendees: N. Flagg, P. Buonaguro, | 0.3 | \$850.00 | \$255.00 |
| Creel,Travis | Senior Manager | 22 Jun 2023 | Indirect Tax Consulting | EY Tennessee state desk email N. Flagg input regarding availability of Tennessee temporary storage exemption for use tax | 1.2 | \$950.00 | \$1,140.00 |
| Flagg,Nancy A. | Executive Director | 22 Jun 2023 | Indirect Tax Consulting | Call with client (L. Koren, J. Morgan) to discuss applicability of New York sales tax exemptions to each of three scenarios identified and estimated Pennsylvania sales tax liability. EY Attendees: N. Flagg, P. Buonaguro, | 0.9 | \$1,150.00 | \$1,035.00 |

| Name | Title | Transaction Date | Project Category | Description | Hours | Hourly Rate | Fee |
|------------------------|--------------------|------------------|-------------------------|--|-------|-------------|------------|
| Flagg,Nancy A. | Executive Director | 22 Jun 2023 | Indirect Tax Consulting | Draft and send Celsius Mining LLC overall state and local tax claim and open item status summary to S. Cantor (Kirkland) | 1.8 | \$1,150.00 | \$2,070.00 |
| Flagg,Nancy A. | Executive Director | 22 Jun 2023 | Indirect Tax Consulting | Email to EY Tennessee state desk T. Creel client (J. Morgan) follow-up question related to Tennessee sales and use tax storage exemption | 0.6 | \$1,150.00 | \$690.00 |
| Flagg,Nancy A. | Executive Director | 22 Jun 2023 | Indirect Tax Consulting | Forward client (J. Morgan) additional New York sales and use tax exemption questions to EY New York / Pennsylvania state desk P. Buonaguro | 0.6 | \$1,150.00 | \$690.00 |
| Flagg,Nancy A. | Executive Director | 22 Jun 2023 | Indirect Tax Consulting | Internal EY call to discuss applicability to New York sales tax exemption for retail sales to transaction. Attendees: N. Flagg, P. Buonaguro, | 0.3 | \$1,150.00 | \$345.00 |
| Flagg,Nancy A. | Executive Director | 22 Jun 2023 | Indirect Tax Consulting | Internal EY call to finalize state and local tax status report requested by Kirkland. Attendees: N. Flagg, K. Gatt | 0.4 | \$1,150.00 | \$460.00 |
| Flagg,Nancy A. | Executive Director | 22 Jun 2023 | Indirect Tax Consulting | Provide EY Tennessee state desk research on Tennessee sales and use tax exemption information to client (J. Morgan) | 0.2 | \$1,150.00 | \$230.00 |
| Gatt,Katie | Senior Manager | 22 Jun 2023 | Indirect Tax Consulting | Call with client (L. Koren, J. Morgan) to discuss applicability of New York sales tax exemptions to each of three scenarios identified and estimated Pennsylvania sales tax liability. EY Attendees: N. Flagg, P. Buonaguro, | 0.9 | \$950.00 | \$855.00 |
| Gatt,Katie | Senior Manager | 22 Jun 2023 | Indirect Tax Consulting | Internal EY call to discuss applicability to New York sales tax exemption for retail sales to transaction. Attendees: N. Flagg, P. Buonaguro, | 0.3 | \$950.00 | \$285.00 |
| Gatt,Katie | Senior Manager | 22 Jun 2023 | Indirect Tax Consulting | Internal EY call to finalize state and local tax status report requested by Kirkland. Attendees: N. Flagg, K. Gatt | 0.4 | \$950.00 | \$380.00 |
| Johnson,Derrick Joseph | Staff/Assistant | 22 Jun 2023 | Indirect Tax Consulting | Update tax claim summary document with claim details, including pre- vs post-petition amounts | 1.1 | \$400.00 | \$440.00 |
| Buonaguro,Paul | Manager | 23 Jun 2023 | Indirect Tax Consulting | EY New York state desk research New York nonresident use tax exemption per client (J. Morgan) request | 1.0 | \$850.00 | \$850.00 |

| Name | Title | Transaction Date | Project Category | Description | Hours | Hourly Rate | Fee |
|----------------|--------------------|------------------|-------------------------|--|-------|-------------|------------|
| Flagg,Nancy A. | Executive Director | 23 Jun 2023 | Indirect Tax Consulting | Email Celsius Mining LLC open tax item status summary copy to client (L. Koren and J. Morgan) for review and comment | 0.2 | \$1,150.00 | \$230.00 |
| Flagg,Nancy A. | Executive Director | 23 Jun 2023 | Indirect Tax Consulting | Email state and local indirect tax status summary to S. Cantor (Kirkland) | 1.7 | \$1,150.00 | \$1,955.00 |
| Flagg,Nancy A. | Executive Director | 23 Jun 2023 | Indirect Tax Consulting | Request unpaid 2022 property tax details from client (J. Morgan) per S. Cantor (Kirkland) request | 0.2 | \$1,150.00 | \$230.00 |
| Flagg,Nancy A. | Executive Director | 26 Jun 2023 | Indirect Tax Consulting | Texas Franchise Tax Report information to EY Texas state desk (J. Bowden) to request input on affiliate schedule filing requirement per Texas Attorney General comments | 0.4 | \$1,150.00 | \$460.00 |
| Bowden,Jamie | Senior Manager | 27 Jun 2023 | Indirect Tax Consulting | Review of organization chart vs entities registered with Texas Comptroller and historical Texas Franchise Tax Reports in order to reply to N. Flagg (EY) re Texas filing status and potential exposure | 1.1 | \$950.00 | \$1,045.00 |
| Flagg,Nancy A. | Executive Director | 27 Jun 2023 | Indirect Tax Consulting | Forward 2022 property tax status information provided by client (J. Morgan) to S. Cantor (Kirkland) | 0.4 | \$1,150.00 | \$460.00 |
| Flagg,Nancy A. | Executive Director | 27 Jun 2023 | Indirect Tax Consulting | Review client (J. Morgan) tax status summary comments and reply | 0.2 | \$1,150.00 | \$230.00 |
| Flagg,Nancy A. | Executive Director | 27 Jun 2023 | Indirect Tax Consulting | Review copies of Texas Franchise Tax Reports for 2019-2021 provided by EY compliance team and forward to EY Texas state desk (J. Bowden) for her review and input on Texas Attorney General comments / exposure | 0.4 | \$1,150.00 | \$460.00 |
| Bowden,Jamie | Senior Manager | 28 Jun 2023 | Indirect Tax Consulting | Call with A. Sexton (Kirkland) and C. Searcy (Texas Attorney General representative) to discuss open information for Celsius Mining LLC / issues in Texas Franchise Tax Reports. EY attendees: N. Flagg, J. Bowden | 0.3 | \$950.00 | \$285.00 |
| Buonaguro,Paul | Manager | 28 Jun 2023 | Indirect Tax Consulting | Research New York and Pennsylvania temporary storage exemptions, taxability determinations and occasional sale exemptions | 0.3 | \$850.00 | \$255.00 |

| Name | Title | Transaction Date | Project Category | Description | Hours | Hourly Rate | Fee |
|----------------|--------------------|------------------|-------------------------|---|--------------|-------------|---------------------|
| Flagg,Nancy A. | Executive Director | 28 Jun 2023 | Indirect Tax Consulting | Call with A. Sexton (Kirkland) and C. Searcy (Texas Attorney General representative) to discuss open information for Celsius Mining LLC / issues in Texas Franchise Tax Reports. EY attendees: N. Flagg, J. Bowden | 0.3 | \$1,150.00 | \$345.00 |
| Flagg,Nancy A. | Executive Director | 28 Jun 2023 | Indirect Tax Consulting | Call with A. Sexton (Kirkland) to discuss Pennsylvania use tax payment and claim resolution status | 0.2 | \$1,150.00 | \$230.00 |
| Flagg,Nancy A. | Executive Director | 28 Jun 2023 | Indirect Tax Consulting | Review client (J. Morgan) Georgia enterprise zone property tax research and reply with claim information | 0.4 | \$1,150.00 | \$460.00 |
| Flagg,Nancy A. | Executive Director | 29 Jun 2023 | Indirect Tax Consulting | Email update to client (J. Morgan) on Pennsylvania post-petition liability payment discussion with A. Sexton (Kirkland) | 0.3 | \$1,150.00 | \$345.00 |
| Gatt,Katie | Senior Manager | 29 Jun 2023 | Indirect Tax Consulting | Weekly tax call to discuss substantive consolidation US federal income tax considerations. Kirkland: M. Kandallu, and A. Sexton. Celsius: L. Koren and J. Morgan. Andersen: H. Griffiths, D. Seymour and S. Shears. EY: K. Gatt, M. Tuchinsky, E. Harvey, and E. Sapir. | 0.5 | \$950.00 | \$475.00 |
| Bowden,Jamie | Senior Manager | 30 Jun 2023 | Indirect Tax Consulting | Call with client (J. Morgan) to discuss Texas franchise tax entity reporting requirements, Pennsylvania sales tax payment. Attendees: N. Flagg, J. Bowden | 1.4 | \$950.00 | \$1,330.00 |
| Flagg,Nancy A. | Executive Director | 30 Jun 2023 | Indirect Tax Consulting | Call with client (J. Morgan) to discuss Texas franchise tax entity reporting requirements, Pennsylvania sales tax payment. Attendees: N. Flagg, J. Bowden | 1.4 | \$1,150.00 | \$1,610.00 |
| Gatt,Katie | Senior Manager | 30 Jun 2023 | Indirect Tax Consulting | Call with client (J. Morgan) to discuss Texas franchise tax entity reporting requirements, Pennsylvania sales tax payment. Attendees: N. Flagg, J. Bowden | 1.4 | \$950.00 | \$1,330.00 |
| Total | | | | | 123.4 | | \$110,810.00 |

Tax Provision

| Name | Title | Transaction Date | Project Category | Description | Hours | Hourly Rate | Fee |
|------------------|---------------------|------------------|------------------|--|------------|-------------|-------------------|
| Amir Chenchinski | Partner / Principal | 29 Jun 2023 | Tax Compliance | Working on deprecation for Celsius mining for tax years 2021+2022 | 1.7 | \$850.00 | \$1,445.00 |
| Ofer Wasserman | Senior Manager | 29 Jun 2023 | Tax Compliance | Working on Texas reports Affiliates and public information report for Celsius mining tax year 2022 | 0.9 | \$695.00 | \$625.50 |
| Total | | | | | 2.6 | | \$2,070.50 |

External Audit Support

| Name | Title | Transaction Date | Project Category | Description | Hours | Hourly Rate | Fee |
|-------------------|---------------------|------------------|------------------------|--|-------|-------------|----------|
| Barda, Eli | Partner / Principal | 29 Jun 2023 | External Audit Support | Meeting to get EY team aligned regarding communications with successor auditor. EY Attendees: S. Zaman, S. Beattie, E. Barda, Y. Schwartz, J. Hill, E. Harvey | 0.5 | \$850.00 | \$425.00 |
| Beattie, Steve | Partner / Principal | 29 Jun 2023 | External Audit Support | Meeting to get EY team aligned regarding communications with successor auditor. EY Attendees: S. Zaman, S. Beattie, E. Barda, Y. Schwartz, J. Hill, E. Harvey | 0.5 | \$850.00 | \$425.00 |
| Harvey, Elizabeth | Partner / Principal | 29 Jun 2023 | External Audit Support | Meeting to get EY team aligned regarding communications with successor auditor. EY Attendees: S. Zaman, S. Beattie, E. Barda, Y. Schwartz, J. Hill, E. Harvey | 0.5 | \$850.00 | \$425.00 |
| Hill, Jeff | Partner / Principal | 29 Jun 2023 | External Audit Support | Meeting to get EY team aligned regarding communications with successor auditor. EY Attendees: S. Zaman, S. Beattie, E. Barda, Y. Schwartz, J. Hill, E. Harvey | 0.5 | \$850.00 | \$425.00 |
| Lipschutz, Jordan | Manager | 29 Jun 2023 | External audit support | Meeting to discuss timeline and approach for the engagement with J. Block (Celsius). EY Attendees: J. Lipschutz, S. Riley, K. Sun, S. Zaman. Other Attendees: J. Block (Celsius) | 0.8 | \$595.00 | \$476.00 |
| Riley, Sean | Senior Manager | 29 Jun 2023 | External Audit Support | Meeting to discuss timeline and approach for the engagement with J. Block (Celsius). EY Attendees: J. Lipschutz, S. Riley, K. Sun, S. Zaman. Other Attendees: J. Block (Celsius) | 0.8 | \$695.00 | \$556.00 |

| Name | Title | Transaction Date | Project Category | Description | Hours | Hourly Rate | Fee |
|---------------|---------------------|------------------|------------------------|--|------------|-------------|-------------------|
| Shwartz, Yoav | Partner / Principal | 29 Jun 2023 | External Audit Support | Meeting to get EY team aligned regarding communications with successor auditor. EY Attendees: S. Zaman, S. Beattie, E. Barda, Y. Shwartz, J. Hill, E. Harvey | 0.5 | \$850.00 | \$425.00 |
| Sun, Kaiyang | Senior Manager | 29 Jun 2023 | External audit support | Meeting to discuss timeline and approach for the engagement with J. Block (Celsius). EY Attendees: J. Lipschutz, S. Riley, K. Sun, S. Zaman. Other Attendees: J. Block (Celsius) | 0.8 | \$695.00 | \$556.00 |
| Zaman, Sabina | Partner / Principal | 29 Jun 2023 | External Audit Support | Meeting to discuss timeline and approach for the engagement with J. Block (Celsius). EY Attendees: J. Lipschutz, S. Riley, K. Sun, S. Zaman. Other Attendees: J. Block (Celsius) | 0.8 | \$850.00 | \$680.00 |
| Zaman, Sabina | Partner / Principal | 29 Jun 2023 | External Audit Support | Meeting to get EY team aligned regarding communications with successor auditor. EY Attendees: S. Zaman, S. Beattie, E. Barda, Y. Shwartz, J. Hill, E. Harvey | 0.5 | \$850.00 | \$425.00 |
| Total | | | | | 6.2 | | \$4,818.00 |

Financial Statement Support

| Name | Title | Transaction Date | Project Category | Description | Hours | Hourly Rate | Fee |
|----------------|---------------------|------------------|-----------------------------|--|------------|-------------|-----------------|
| Beattie, Steve | Partner / Principal | 29 Jun 2023 | Financial Statement Support | Meeting with Celsius to discuss the scope of effort anticipated for 2021 financial statements. EY Attendees: S. Zaman, S. Beattie. Other Attendees: L. Koren (Celsius), and J. Block (Celsius), A. Seetharaman (Celsius) | 0.5 | \$850.00 | \$425.00 |
| Zaman, Sabina | Partner / Principal | 29 Jun 2023 | Financial Statement Support | Meeting with Celsius to discuss the scope of effort anticipated for 2021 financial statements. EY Attendees: S. Zaman, S. Beattie. Other Attendees: L. Koren (Celsius), and J. Block (Celsius), A. Seetharaman (Celsius) | 0.5 | \$850.00 | \$425.00 |
| Total | | | | | 1.0 | | \$850.00 |

SEC Pre-Clearance

| Name | Title | Transaction Date | Project Category | Description | Hours | Hourly Rate | Fee |
|-----------------|---------------------|------------------|--------------------------------|--|------------|-------------|-------------------|
| Helwing, Dan S. | Partner / Principal | 29 Jun 2023 | SEC Pre-Clearance Memo Support | Meeting to discuss preliminary observations on the initial SEC preclearance draft. EY Attendees: S. Zaman, D. Helwing. Other Attendees: J. Block (Celsius) | 0.5 | \$850.00 | \$425.00 |
| Zaman, Sabina | Partner / Principal | 29 Jun 2023 | SEC Pre-Clearance Memo Support | Meeting to discuss preliminary observations on the initial SEC preclearance draft. EY Attendees: S. Zaman, D. Helwing. Other Attendees: J. Block (Celsius) | 0.5 | \$850.00 | \$425.00 |
| Helwing, Dan S. | Partner / Principal | 30 Jun 2023 | SEC Pre-Clearance Memo Support | Meeting to discuss additional comments on the initial SEC preclearance draft EY Attendees: D. Helwing, S. Jacobs, C. Jin | 0.5 | \$850.00 | \$425.00 |
| Jacobs, Steven | Partner / Principal | 30 Jun 2023 | SEC Pre-Clearance Memo Support | Meeting to discuss additional comments on the initial SEC preclearance draft EY Attendees: D. Helwing, S. Jacobs, C. Jin | 0.5 | \$850.00 | \$425.00 |
| Jin, Crystal | Manager | 30 Jun 2023 | SEC Pre-Clearance Memo Support | Meeting to discuss additional comments on the initial SEC preclearance draft EY Attendees: D. Helwing, S. Jacobs, C. Jin | 0.5 | \$595.00 | \$297.50 |
| Helwing, Dan S. | Partner / Principal | 29 Jun 2023 | SEC Pre-Clearance Memo Support | First pass at reviewing the SEC preclearance draft for Celsius | 2.0 | \$850.00 | \$1,700.00 |
| Zaman, Sabina | Partner / Principal | 29 Jun 2023 | SEC Pre-Clearance Memo Support | Review and provide comments on SEC preclearance draft | 2.0 | \$850.00 | \$1,700.00 |
| Helwing, Dan S. | Partner / Principal | 30 Jun 2023 | SEC Pre-Clearance Memo Support | Clarifying and enhancing comments on SEC preclearance draft for Celsius team's review | 0.4 | \$850.00 | \$340.00 |
| Zaman, Sabina | Partner / Principal | 30 Jun 2023 | SEC Pre-Clearance Memo Support | Prepare updates to comments on SEC preclearance draft to provide to Celsius | 0.4 | \$850.00 | \$340.00 |
| Total | | | | | 7.3 | | \$6,077.50 |

Tax Compliance

| Name | Title | Transaction Date | Project Category | Description | Hours |
|------------------|---------------------|------------------|------------------|--|-------|
| Amir Chenchinski | Partner / Principal | 29 Mar 2023 | Tax Compliance | Review of IRS extensions for New Jersey state income tax return for Celsius Network Inc | 0.9 |
| Maria Nazarenko | Staff | 04 Apr 2023 | Tax Compliance | Review South Carolina state income tax return extension for Celsius Network LLC | 1.8 |
| Maria Nazarenko | Staff | 05 Apr 2023 | Tax Compliance | Prepare IRS extensions for Connecticut state income tax return for Celsius Network Inc | 0.7 |
| Ofer Wasserman | Senior Manager | 16 Apr 2023 | Tax Compliance | Preparation of IRS extension for California state income tax return for Celsius Network Inc | 1.3 |
| Ofer Wasserman | Senior Manager | 16 Apr 2023 | Tax Compliance | Review of IRS extensions for Connecticut state income tax return for Celsius Network Inc | 1.1 |
| Ofer Wasserman | Senior Manager | 16 Apr 2023 | Tax Compliance | Preparation of IRS extensions for Washington state income tax return for Celsius Network Inc | 0.9 |
| Ofer Wasserman | Senior Manager | 16 Apr 2023 | Tax Compliance | Review of IRS extensions for Boston state income tax return for Celsius Network Inc | 1.1 |
| Ofer Wasserman | Senior Manager | 16 Apr 2023 | Tax Compliance | Preparation of IRS extensions for Michigan state income tax return for Celsius Network Inc | 1.1 |
| Ofer Wasserman | Senior Manager | 16 Apr 2023 | Tax Compliance | Preparation of IRS extensions for New Jersey state income tax return for Celsius Network Inc | 1.3 |
| Ofer Wasserman | Senior Manager | 16 Apr 2023 | Tax Compliance | Review of IRS extensions for New York state income tax return for Celsius Network Inc | 1.1 |
| Ofer Wasserman | Senior Manager | 16 Apr 2023 | Tax Compliance | Review of IRS extensions for Oklahoma and Oregon states (income tax returns) for Celsius Network Inc | 0.8 |
| Ofer Wasserman | Senior Manager | 16 Apr 2023 | Tax Compliance | Preparation of IRS extensions for Wisconsin state for Celsius Network Inc | 1.2 |
| Amir Chenchinski | Partner / Principal | 17 Apr 2023 | Tax Compliance | Review of IRS extensions for New Jersey state for Celsius Network Inc. and affiliates | 0.8 |
| Amir Chenchinski | Partner / Principal | 17 Apr 2023 | Tax Compliance | Continuation of Review of IRS extensions for New Jersey state for Celsius Network Inc. | 1.2 |
| Amir Chenchinski | Partner / Principal | 17 Apr 2023 | Tax Compliance | Review of IRS extensions for New York state for Celsius Network Inc. and affiliates | 0.9 |
| Amir Chenchinski | Partner / Principal | 17 Apr 2023 | Tax Compliance | Continuation of Review of IRS extensions for New York state for Celsius Network Inc and affiliates | 1.1 |

| Name | Title | Transaction Date | Project Category | Description | Hours |
|------------------|---------------------|------------------|------------------|---|-------|
| Ofer Wasserman | Senior Manager | 17 Apr 2023 | Tax Compliance | Review Texas extension for Celsius Network Inc and affiliates | 1.1 |
| Ofer Wasserman | Senior Manager | 17 Apr 2023 | Tax Compliance | Review North Carolina state extensions for NON Unitary Celsius Network LLC | 1.3 |
| Ofer Wasserman | Senior Manager | 17 Apr 2023 | Tax Compliance | Review of IRS extensions for North Carolina state for Celsius Holdings LLC | 0.9 |
| Ofer Wasserman | Senior Manager | 17 Apr 2023 | Tax Compliance | Review South Carolina extensions for Celsius Network LLC | 1.4 |
| Ofer Wasserman | Senior Manager | 17 Apr 2023 | Tax Compliance | Review Tennessee state extensions for Celsius Network LLC | 1.2 |
| Ofer Wasserman | Senior Manager | 17 Apr 2023 | Tax Compliance | Preparation Georgia IRS extension Form for Celsius Network Inc | 0.9 |
| Ofer Wasserman | Senior Manager | 17 Apr 2023 | Tax Compliance | Review Celsius Network North Carolina state IRS extensions for Celsius Holdings LLC | 1.1 |
| Ofer Wasserman | Senior Manager | 17 Apr 2023 | Tax Compliance | Preparation South Carolina state IRS extensions for Celsius Network Inc | 1.3 |
| Ofer Wasserman | Senior Manager | 18 Apr 2023 | Tax Compliance | Review IRS Extensions for Tennessee state for Celsius Network LLC | 1.2 |
| Ofer Wasserman | Senior Manager | 18 Apr 2023 | Tax Compliance | Preparation Georgia state IRS extensions for Celsius Network Inc | 1.3 |
| Ofer Wasserman | Senior Manager | 18 Apr 2023 | Tax Compliance | Review Maryland state IRS extensions for Celsius Network Inc | 0.9 |
| Ofer Wasserman | Senior Manager | 18 Apr 2023 | Tax Compliance | Review North Carolina state IRS extensions for Celsius Holdings LLC | 0.9 |
| Ofer Wasserman | Senior Manager | 18 Apr 2023 | Tax Compliance | Review South Carolina IRS extensions for Celsius Network Inc | 1.3 |
| Ofer Wasserman | Senior Manager | 18 Apr 2023 | Tax Compliance | Review IRS extension Form for Tennessee state and Celsius Network Inc | 1.1 |
| Ofer Wasserman | Senior Manager | 23 Apr 2023 | Tax Compliance | Analyzed with Marty extensions regarding time line | 0.6 |
| Amir Chenchinski | Partner / Principal | 01 May 2023 | Tax Compliance | Review of IRS extensions for Tennessee state for Celsius Network LLC | 1.3 |
| Ofer Wasserman | Senior Manager | 02 May 2023 | Tax Compliance | Prepare IRS form - Information document request for Celsius Holding | 0.9 |
| Ofer Wasserman | Senior Manager | 02 May 2023 | Tax Compliance | Prepare IRS form - Information document request for Celsius Network LLC | 1.1 |
| Ofer Wasserman | Senior Manager | 03 May 2023 | Tax Compliance | Continuation of Preparing IRS form - Information document request for Celsius Holdings LLC | 0.4 |
| Ofer Wasserman | Senior Manager | 03 May 2023 | Tax Compliance | Prepare IRS form - Information document request for Celsius Network LLC | 0.4 |
| Ofer Wasserman | Senior Manager | 03 May 2023 | Tax Compliance | Continuation - Preparation of IRS form - Information document request for Celsius Network Inc | 0.3 |
| Amir Chenchinski | Partner / Principal | 10 May 2023 | Tax Compliance | Review South Carolina extension Form for Celsius Network Inc | 0.9 |

| Name | Title | Transaction Date | Project Category | Description | Hours |
|------------------|---------------------|------------------|------------------|--|-------------|
| Amir Chenchinski | Partner / Principal | 11 May 2023 | Tax Compliance | Continuation of Review South Carolina extension Form for Celsius Network LLC | 0.6 |
| Ofer Wasserman | Senior Manager | 17 May 2023 | Tax Compliance | Reviewed open items regarding extensions and report of foreign bank and financial accounts information | 1.2 |
| Total | | | | | 40.9 |

Total Fixed Fee for Tax Compliance Services During the Fee Period \$0.00

Transfer Pricing

| Name | Title | Transaction Date | Project Category | Description | Hours |
|----------------|---------------------|------------------|------------------|--|-------|
| Benjamin Gandz | Senior Manager | 22 Jun 2023 | Transfer Pricing | Reviewing working paper files received from client in connection to the management allocation. Attendees - B. Gandz (EY), A. Sussman (EY), E. Gonen (EY) and E. Geron (EY) | 1.1 |
| Benjamin Gandz | Senior Manager | 22 Jun 2023 | Transfer Pricing | Reviewing working paper files received from client in connection to the development, enhancement, maintenance, protection, and exploitation ("DEMPE") analysis - Day 1. Attendees - B. Gandz (EY), A. Sussman (EY) and E. Geron (EY) | 0.9 |
| Eyal Geron | Manager | 22 Jun 2023 | Transfer Pricing | Reviewing working paper files received from client in connection to the management allocation. Attendees - B. Gandz (EY), A. Sussman (EY), E. Gonen (EY) and E. Geron (EY) | 1.1 |
| Eyal Geron | Manager | 22 Jun 2023 | Transfer Pricing | Reviewing working paper files received from client in connection to the development, enhancement, maintenance, protection, and exploitation ("DEMPE") analysis - Day 1. Attendees - B. Gandz (EY), A. Sussman (EY) and E. Geron (EY) | 0.9 |
| Eyal Gonen | Partner / Principal | 22 Jun 2023 | Transfer Pricing | Reviewing working paper files received from client in connection to the management allocation. Attendees - B. Gandz (EY), A. Sussman (EY), E. Gonen (EY) and E. Geron (EY) | 1.1 |
| Adam Sussman | Senior | 22 Jun 2023 | Transfer Pricing | Reviewing working paper files received from client in connection to the management allocation. Attendees - B. Gandz (EY), A. Sussman (EY), E. Gonen (EY) and E. Geron (EY) | 1.1 |
| Adam Sussman | Senior | 22 Jun 2023 | Transfer Pricing | Reviewing working paper files received from client in connection to the development, enhancement, maintenance, protection, and exploitation ("DEMPE") analysis - Day 1. Attendees - B. Gandz (EY), A. Sussman (EY) and E. Geron (EY) | 0.9 |

| Name | Title | Transaction Date | Project Category | Description | Hours |
|----------------|---------------------|------------------|------------------|---|-------|
| Benjamin Gandz | Senior Manager | 25 Jun 2023 | Transfer Pricing | Reviewing working paper files received from client in connection to the development, enhancement, maintenance, protection, and exploitation ("DEMPE") analysis - Day 2. Attendees - B. Gandz (EY), A. Sussman (EY) and E. Geron (EY) | 2.9 |
| Eyal Geron | Manager | 25 Jun 2023 | Transfer Pricing | Reviewing working paper files received from client in connection to the development, enhancement, maintenance, protection, and exploitation ("DEMPE") analysis - Day 2. Attendees - B. Gandz (EY), A. Sussman (EY) and E. Geron (EY) | 2.9 |
| Adam Sussman | Senior | 25 Jun 2023 | Transfer Pricing | Reviewing working paper files received from client in connection to the development, enhancement, maintenance, protection, and exploitation ("DEMPE") analysis - Day 2. Attendees - B. Gandz (EY), A. Sussman (EY) and E. Geron (EY) | 2.9 |
| Benjamin Gandz | Senior Manager | 26 Jun 2023 | Transfer Pricing | Analyzing contribution of GK8. Attendees A.Sussman (EY), E. Geron (EY) and B. Gandz (EY) | 1.9 |
| Eyal Geron | Manager | 26 Jun 2023 | Transfer Pricing | Analyzing contribution of GK8. Attendees A.Sussman (EY), E. Geron (EY) and B. Gandz (EY) | 1.9 |
| Adam Sussman | Senior | 26 Jun 2023 | Transfer Pricing | Analyzing contribution of GK8. Attendees A.Sussman (EY), E. Geron (EY) and B. Gandz (EY) | 1.9 |
| Benjamin Gandz | Senior Manager | 28 Jun 2023 | Transfer Pricing | Meeting with client to analyze development, enhancement, maintenance, protection, and exploitation ("DEMPE") analysis and background of facts and assumptions. Attendees - B. Gandz (EY), A. Sussman (EY), E. Gonen (EY) and E. Geron (EY) and L. Koren (Celsius), D. Bram (Celsius) and M. Nachman (Celsius) | 0.9 |
| Eyal Geron | Manager | 28 Jun 2023 | Transfer Pricing | Meeting with client to analyze development, enhancement, maintenance, protection, and exploitation ("DEMPE") analysis and background of facts and assumptions. Attendees - B. Gandz (EY), A. Sussman (EY), E. Gonen (EY) and E. Geron (EY) and L. Koren (Celsius), D. Bram (Celsius) and M. Nachman (Celsius) | 0.9 |
| Eyal Gonen | Partner / Principal | 28 Jun 2023 | Transfer Pricing | Meeting with client to analyze development, enhancement, maintenance, protection, and exploitation ("DEMPE") analysis and background of facts and assumptions. Attendees - B. Gandz (EY), A. Sussman (EY), E. Gonen (EY) and E. Geron (EY) and L. Koren (Celsius), D. Bram (Celsius) and M. Nachman (Celsius) | 0.9 |
| Adam Sussman | Senior | 28 Jun 2023 | Transfer Pricing | Meeting with client to analyze development, enhancement, maintenance, protection, and exploitation ("DEMPE") analysis and background of facts and assumptions. Attendees - B. Gandz | 0.9 |

| Name | Title | Transaction Date | Project Category | Description | Hours |
|----------------|----------------|------------------|------------------|--|-------------|
| | | | | (EY), A. Sussman (EY), E. Gonen (EY) and E. Geron (EY) and L. Koren (Celsius), D. Bram (Celsius) and M. Nachman (Celsius) | |
| Benjamin Gandz | Senior Manager | 29 Jun 2023 | Transfer Pricing | Preparing action plan for documentation including local file and Masterfile and contemporaneous files . Attendees - B. Gandz (EY), A. Sussman (EY) and E. Geron (EY) | 1.2 |
| Eyal Geron | Manager | 29 Jun 2023 | Transfer Pricing | Preparing action plan for documentation including local file and Masterfile and contemporaneous files . Attendees - B. Gandz (EY), A. Sussman (EY) and E. Geron (EY) | 1.2 |
| Adam Sussman | Senior | 29 Jun 2023 | Transfer Pricing | Preparing action plan for documentation including local file and Masterfile and contemporaneous files . Attendees - B. Gandz (EY), A. Sussman (EY) and E. Geron (EY) | 1.2 |
| Total | | | | | 28.7 |

Total Fixed Fees Sought During the Fee Period for Transfer Pricing Services: \$0.00

Fee Application Preparation

| Employee Name | Rank | Date | Project Category | Description | Hours | Hourly Rate | Total Individual Fees |
|----------------|-------|----------------|--------------------------------|---|------------|-------------|-----------------------|
| Duncker, Debra | Staff | March 29, 2023 | Preparation of Fee Application | Prepare fee statement for the Combined Second Monthly for filing. (November 1, 2022 - December 31, 2022) | 1.0 | \$250.00 | \$250.00 |
| Duncker, Debra | Staff | March 30, 2023 | Preparation of Fee Application | Continue preparation of fee statement for the Combined Second Monthly for filing. (November 1, 2022 - December 31, 2022) | 0.5 | \$250.00 | \$125.00 |
| Duncker, Debra | Staff | April 11, 2023 | Preparation of Fee Application | Preparation of fee statement for the Combined Third Monthly Fee Statement for filing. (January 1, 2023 - February 28, 2023) | 1.4 | \$250.00 | \$350.00 |
| Duncker, Debra | Staff | April 12, 2023 | Preparation of Fee Application | Preparation of the Second Interim Fee Application (November 1 - February 28, 2023) | 1.3 | \$250.00 | \$325.00 |
| Duncker, Debra | Staff | April 13, 2023 | Preparation of Fee Application | Continued preparation of the Second Interim Fee Application (November 1 - February 28, 2023) | 0.5 | \$250.00 | \$125.00 |
| Duncker, Debra | Staff | June 21, 2023 | Preparation of Fee Application | Review of Fee Schedules for the Combined Fourth Monthly Fee Statement (3/1/23 - 4/30/23) | 1.6 | \$250.00 | \$400.00 |
| Duncker, Debra | Staff | June 27, 2023 | Preparation of Fee Application | Prepare Combined Fourth Monthly Fee Statement for filing (covering 3/1/23 - 4/30/23) | 0.9 | \$250.00 | \$225.00 |
| Duncker, Debra | Staff | June 29, 2023 | Preparation of Fee Application | Continue preparing Combined Fourth Monthly Fee Statement for filing (covering 3/1/23 - 4/30/23) | 0.3 | \$250.00 | \$75.00 |
| | | | | Total | 7.5 | | \$1,875.00 |